

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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JARROD STRINGER, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. SA-20-CV-46-OG
)	
RUTH R. HUGHES, et al.,)	
)	
Defendants.)	
)	
_____)	

Remote Videotaped Oral Deposition of

GRACE CHIMENE

30(b)(6)

Tuesday, April 21, 2020

Reported by:
KIMBERLEE SCHROEDER, CSR, RPR, CCRR
TX CSR 10925 - CA CSR 11414

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(All Appearances Via Remote Videoconference)

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I N D E X

DEPOSITION OF GRACE CHIMENE

EXAMINATION

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By Mr. Hilton

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1 BE IT REMEMBERED that on Tuesday,
2 April 21, 2020, commencing at the hour of 10:21 a.m.,
3 via remote videoconferencing, before me,
4 KIMBERLEE SCHROEDER, a Certified Shorthand Reporter in
5 and for the State of Texas and the State of California,
6 duly authorized to administer oaths pursuant to Section
7 30(c) of the Federal Rules of Civil Procedure and the
8 Texas Rules of Civil Procedure, personally appeared

9 GRACE CHIMENE,
10 called as a witness herein by the Defendants, who,
11 having been duly sworn, was thereupon examined as
12 hereinafter set forth.
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P R O C E E D I N G S

Tuesday, April 21, 2020

10:21 a.m.

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THE REPORTER: We are on the record.

This is the deposition of League of Women Voters of Texas in the matter of Jarrod Stringer, et al. v. Ruth R. Hughes, et al. We are appearing remotely via Zoom due to the coronavirus Pandemic. We are on the record at 10:21 a.m.

My name is Kim Schroeder and my business address is with Integrity Legal Support Solutions, P.O. Box 245 Manchaca, Texas 78652.

Would all persons present please introduce themselves for the record?

MR. HILTON: Chris Hilton for the defendants.

MS. MARZIANI: Mimi Marziani for the plaintiffs.

MR. MIRZA: Hani Mirza on behalf of the plaintiffs.

MS. BRANCH: This is Aria Branch on behalf of the plaintiff-intervenors.

MR. GONZALEZ: And Joaquin Gonzalez on behalf of plaintiffs.

GRACE CHIMENE,
after being first duly sworn by the Certified Shorthand

1 Reporter, was examined and testified as follows:

2 EXAMINATION

3 BY MR. HILTON:

4 Q. Can you please state and spell your name for
5 the record as well, please?

6 A. Grace Chimene, C-h-i-m-e-n-e.

7 Q. Great. Thank you so much. I appreciate you
8 taking the time to do this. I appreciate your patience
9 under these circumstances like we were chatting about.

10 I want to start by kind of asking you are who
11 you and what's your role with the League of Women
12 Voters.

13 A. I am Grace Chimene, and I am the president of
14 the League of Women Voters of Texas.

15 Q. And how long have you been involved with the
16 League of Women Voters of Texas?

17 A. I joined the League in 2012 and got on the
18 board I think in '12 -- probably 2014. Yes, 2014, I
19 think I got on the board.

20 Q. And when did you become president?

21 A. Two years ago in June.

22 Q. What made you want to join the League?

23 A. I wish things wouldn't pop up.

24 I joined the League. My mother was a member
25 of the League. In 2012, I was working on a campaign,

1 and something occurred that made me want to join an
2 organization that was nonpartisan instead of partisan,
3 so I joined a nonpartisan organization that believed in
4 educating voters and encouraging all voters to
5 participate in voting. And it was very-fact based, and
6 I really enjoyed it. That's why I joined the League.
7 But my mother was a member of the League, too, along
8 with --

9 **Q. What campaign were you working on and what**
10 **happened that made you want to switch over to the League**
11 **as opposed to whatever you were doing before?**

12 A. I was working on a campaign for the -- my
13 state representative. I hadn't done a lot of
14 campaigning, but my state representative at that time to
15 the state legislature. He wasn't continuing on, and so
16 he had told me I should go ahead, and he introduced me
17 to this new person who was running. And so his name was
18 Chris Branson. And I helped him with his campaign,
19 mostly by helping him with his calendar, doing some
20 technology for stuff for him. So that's what I did for
21 him.

22 And so what happened is I was going through
23 the neighborhood. I think this was the -- Obama was
24 running for president, and I was going through the
25 neighborhood, and one of the neighbors hung a chair from

1 his oak tree in the front yard, and it represented
2 President Obama. So it was showing that he was lynching
3 President Obama.

4 I took offense to it. My husband took a
5 picture. I put it on Facebook. Somebody put it in the
6 newspaper. It went viral all over the world and created
7 a huge stir where people were going up and down the
8 neighborhood with Civil War flags, or those Confederate
9 flags, and it was a very -- it lasted for about a week,
10 and it was a very scary time.

11 And -- and I decided that I wanted to join the
12 League of Women Voters because I wanted to be in a
13 nonpartisan organization that believed in civil
14 discussion and worked toward all people getting to vote.

15 So there you go. It was an NPR story.
16 Actually, it turned out that they did that a couple, I
17 think six months ago or something. But yes, there you
18 go. See, I said it, and I didn't even cry.

19 **Q. I appreciate you sharing that story. And I**
20 **certainly didn't know what I was asking, so I'm sorry to**
21 **make you tell that painful experience again. I do**
22 **appreciate you sharing it.**

23 **So hopefully switching to something that's a**
24 **little more pleasant to talk about, I'd just kind of**
25 **like to know more about your current work with the**

1 League and your role as the president, what does that
2 entail, that sort of thing. So what does being
3 president of the League of Women Voters in Texas entail?

4 A. So the president of League of the Women Voters
5 of Texas, there is a state or local leagues, and there's
6 a state league and there's a national league. And we're
7 all one organization, but I am the president of the
8 Texas league, which means I am over the Texas board.

9 I run the meetings. If there is something
10 that comes up and I need to -- I would be the one who
11 speaks for the League. I review all of the stuff that
12 goes out, like you know, if we write something to
13 somebody like Secretary of State's office, I review what
14 goes out.

15 I look over all the advocacy we do. It's a
16 grassroots organization. The local members are really
17 in charge of everything. What I'm doing is guiding and
18 speaking for the League at the state level. We also put
19 together a statewide Voters Guide.

20 And so the local leagues would take care of
21 all the candidates for the Voters Guide in county
22 elections and city elections, municipal elections, all
23 of those. And the state league would do the Voters
24 Guide and ask the questions and get the candidates --
25 try to get the candidates to respond. And we create the

1 statewide Voters Guide for all the statewide candidates,
2 along with some of the non-statewides that cover huge
3 regions, like the State Board of Education, the Railroad
4 Commissioners and stuff like that.

5 Is that -- that's -- I'm trying to think. So
6 there's -- then I run all of the -- I oversee all of the
7 voter education we do, the guides, the Voters Guides,
8 all the social media, videos, education. I run the
9 convention.

10 It's huge. It's a huge job. But I can think
11 of more if you want me to say more. So...

12 **Q. I was going to say is that it, or --**

13 A. And it's an all-volunteer organization. We
14 have just one-and-three-quarters employees at the state
15 level. And so I am a volunteer. All of the board
16 members are volunteers. Almost everybody in the league
17 locally and statewide are all volunteers.

18 Some leagues have enough money to pay somebody
19 part-time to do some things. We have enough money to
20 pay one-and-a-half, one-and-three-quarters persons to do
21 something. We just used to have one employee, and now
22 we have one-and-three-quarters.

23 **Q. By "one-and-three-quarters," you mean someone**
24 **works half time or 30 hours a week or whatever?**

25 A. Yes, yes. Yeah. We have Aileen McMurrer is

1 like an administrative executive type person, and she
2 does -- she does the Constant Contact and stuff like
3 that, putting out the newsletters.

4 There is an office downtown. Then Karen Kelly
5 is the three-quarters person, and she does the like
6 membership because we have a lot of members who join at
7 the state league level because of the way our
8 organization works.

9 Do you want me to go into that?

10 **Q. I think that's -- I think that's fine for now.**
11 **I'm just trying to get an overview to kind of orient**
12 **myself. I think some of this will come up when we're**
13 **going through the documents, but I appreciate that.**

14 A. Thank you.

15 MR. HILTON: And then a quick question for
16 Brian. I'm getting some feedback on my end.

17 Is anyone else hearing that? Do we have any
18 idea what the source is?

19 (Discussion off the record.)

20 MR. HILTON: Q. All right. Sorry. Hopefully
21 that's the last technical issue we encounter.

22 So I guess I want to know a little bit more
23 about you personally, about what education you've had,
24 what career you've had before you joined the League, or
25 if you do other work outside of being president of the

1 League of Women Voters of Texas. Although it does sound
2 like pretty much a full-time job.

3 But maybe you can start just with your
4 education. Explain what education you've had and maybe
5 go into giving me an overview of what career you've had
6 over the course of your life, if any.

7 A. Okay. I was a registered nurse for two years,
8 and then I went back to school, and I became a pediatric
9 nurse practitioner. So I got my masters in nursing and
10 was a registered nurse and pediatric nurse practitioner
11 for about more than 30 years.

12 And then I was working part-time when I was in
13 charge of advocacy and then when I became president, I
14 went to -- I just retired. So I just actually retired
15 my license. Now I am a retired nurse, whereas my career
16 was as a pediatric nurse practitioner, which is
17 interesting, isn't it, since this is so different than
18 that.

19 Q. Yeah, it is.

20 So how did that experience kind of lead to you
21 joining the League, or was it related? What led you to
22 this point in your life since your career wasn't really
23 related?

24 A. Because as a pediatric nurse practitioner, I
25 often dealt with people who did not have insurance or

1 people who had insurance that had -- maybe they had
2 Medicaid, and at some points they were only allowed to
3 have three medications per month, and it turned out that
4 they needed four, and the last one was really expensive.

5 And so I understood that policy was really
6 important, and that something was going on with policy
7 that was making it so that, one, at first I couldn't
8 write prescriptions, and two, my patients weren't
9 getting the care they needed to get through the system
10 that we had.

11 So I understood that policy was important. So
12 that helped me what I started off as a -- in the League
13 because I became -- I said, "Well, I'm a pediatric nurse
14 practitioner," so they let me look at the issue of child
15 health.

16 And so in the League, we have different
17 positions, and I support -- I supported the positions of
18 child health at that time before I got on the board.
19 And I also would go to the Capitol and read the
20 testimony that other volunteer issue chairs through the
21 League would write. So that led me onto the board.

22 Apparently they liked my reading ability.

23 **Q. That will take you far.**

24 **A. There you go.**

25 **Q. At least it has for me.**

1 So did you -- so I understand that the League
2 is nonpartisan, or that's what you said earlier.

3 Did you, before joining the League, you
4 mentioned you did some partisan political work. Can you
5 give me an idea of the extent to which you volunteered
6 on campaigns and you were involved with campaigns over
7 the course of your life?

8 A. I think the only time I did it was when my
9 state representative was retiring, and a new person
10 whose name was Chris Branson, who actually lost the
11 election, and he and his wife joined the League.
12 Everybody on that campaign joined the League because we
13 all understood how important voting in elections is.

14 And so being a -- so, yes, we do work on --
15 people don't come to the league without having an
16 interest in politics. And so that sort of develops my
17 interest along with that thing that happened, and that's
18 why I joined the League.

19 So I don't know -- I can't remember what the
20 actual question was by the time I started talking.

21 Q. That -- that answered it. Whatever it was, it
22 answered it so I appreciate it.

23 So the background about you personally is very
24 helpful. But of course today you're here to testify on
25 behalf of the League of Women Voters of Texas. It's

1 called a 30(b)(6) deposition, which means, you know,
2 obviously I'm asking about you personally, but when we
3 start talking about other topics, I'm really asking
4 about the League. Did you understand that?

5 A. Yes, okay. Thank you.

6 Q. And so as part of that, you had an obligation
7 to prepare for this deposition. So what did you do to
8 prepare for the deposition today?

9 A. I met with the lawyers I think on -- last
10 week. I don't want to be more specific because I can't
11 remember which day. And then I talked to them again
12 this morning. And I read through -- I helped gather the
13 material that was requested from our Google folders and
14 from our website. And I provided those to the lawyers.

15 And then the -- then I read through the
16 300-and-something-50 page document last night. And just
17 reviewed some of them just so that it would be more
18 fresh and nothing would be new. But I didn't spend
19 hours and hours. I just read through them and looked
20 over them to see which ones were there.

21 Q. And that document you're referring to, that's
22 the Bates numbered documents that we talked about before
23 we went on the record that we're going to talk about in
24 a little bit here?

25 A. I believe so.

1 **Q. Did you review any other documents other than**
2 **those to prepare for this deposition?**

3 A. I looked through the -- I believe there were
4 two league members who provided some kind of testimony
5 or a document. And so I read through what they
6 provided. I read the document that said -- I'm sorry, I
7 don't know the names of them, the document that said
8 what I had signed saying what the League believed. I
9 read through that one.

10 So I think that's it. I think it was the
11 documents I turned in, the two documents from the League
12 members who turned in something, and the beginning thing
13 that I signed. Okay. I'm sorry, I don't know the words
14 for them.

15 **Q. No, no, that's all right. I'm pretty sure I**
16 **know exactly what those are, and I'm going to try and do**
17 **a screen share here just so we can be clear what they**
18 **are and attach them as exhibits to the deposition.**

19 A. I'm going to lower my -- the sun is shining in
20 my eyes too much. I've got to lower my shade.

21 **Q. Of course. Of course.**

22 A. Just a second. Thank you. Much better.

23 **Q. All right. I'm sharing on the screen a**
24 **document that was Exhibit 27 to plaintiffs' motion for**
25 **preliminary injunction in this case. On page 2 of this**

1 document, of this Exhibit 27, there's a page titled
2 "Declaration of Phyllis Finnemore."

3 A. Yes.

4 Q. That is a six-page declaration with a
5 signature from Phyllis Finnemore, at least it looks like
6 it at the end.

7 Is that one of the documents you are referring
8 to, Ms. Chimene?

9 A. Yes.

10 MR. HILTON: We'll attach this as Exhibit 1 to
11 this deposition.

12 (Defense Exhibit No. 1 was marked for
13 identification.)

14 MR. HILTON: Q. I'm sharing another document
15 on this screen. This is Exhibit 28 to plaintiffs'
16 motion for preliminary injunction. On the second page
17 of this document, it has a title that says, "Declaration
18 of Sharon E. Walther." That's a four-page declaration,
19 again, with a signature on the last page.

20 Is that one of the documents you are talking
21 about?

22 A. I did read through that, too.

23 MR. HILTON: Okay. And we'll attach this as
24 Exhibit 2 to the deposition.

25 /////

1 (Defense Exhibit No. 2 was marked for
2 identification.)

3 MR. HILTON: Q. All right. I'm now sharing
4 Exhibit 23 to plaintiffs' motion for preliminary
5 injunction. On the second page of that document, it has
6 a title that says, "Declaration of Grace Chimene."

7 Am I saying that properly, "Chimene"?

8 A. Yes. Perfect. Excellent.

9 Q. And that is a five-page declaration.
10 I'm now sharing page 5 on the screen. Is that
11 your signature?

12 A. Yes.

13 Q. Is this one of the documents that you are
14 referring to that you reviewed in preparation for the
15 deposition?

16 A. Yes.

17 (Defense Exhibit No. 3 was marked for
18 identification.)

19 MR. HILTON: Q. I'm showing one more document
20 on the screen. This was Exhibit 9 to plaintiffs' reply
21 in support of their motion for preliminary injunction.
22 The title is "Supplemental Declaration of Grace
23 Chimene." It's a two-page declaration.

24 I'm showing page 2. Is that your signature,
25 Ms. Chimene?

1 A. Yes.

2 Q. It also has two pages attached to it which
3 were produced and our Bates numbers. We'll talk about
4 those later. But this supplemental declaration, did you
5 review that in preparation for your deposition today?

6 A. No.

7 Q. Okay. That's all right. I might have
8 questions about it for you later, but I'll put it back
9 up on the screen.

10 A. Okay. Sorry, go ahead.

11 (Defense Exhibit No. 4 was marked for
12 identification.)

13 MR. HILTON: Q. Sorry. Thanks for bearing
14 with me. I'm trying to manage my pdfs so I can share
15 the right ones.

16 (Defense Exhibit No. 5 was marked for
17 identification.)

18 MR. HILTON: Q. I'm now showing on the
19 screen, I think we're up to Exhibit 5 for this
20 deposition. It is a six-page document. It's titled
21 "Defendants' Notice of Oral Deposition Pursuant to
22 Federal Rule Civil Procedure 30," and it's issued to
23 plaintiff League of Women Voters of Texas.

24 Do you see that on the screen, Ms. Chimene?

25 A. Yes.

1 Q. There have been several versions of this
2 document that have gone back and forth between us and
3 your lawyers. Have you seen at least a version of this
4 notice?

5 A. I believe so. But I didn't review it last
6 night.

7 Q. Understood. This version of notice is dated
8 yesterday, April 20th, 2020. Do you know if you
9 reviewed the version of the notice that we sent over
10 yesterday?

11 If you don't know or remember what version it
12 is, it's fine.

13 A. Yeah, I don't know.

14 Q. Okay. I'm on page 5 of this exhibit. Title
15 of page 5 is "30(b)(6) Corporate Representative
16 Deposition Topics."

17 A. Okay.

18 Q. Does that list look familiar to you?

19 A. Yes, it does.

20 Q. Is this the list you reviewed to prepare for
21 the deposition today?

22 A. This is the list that I used to gather the
23 information that I could find to provide to you.

24 Q. Are you prepared to testify about all of these
25 topics today?

1 A. Yes.

2 Q. Then the last page of this exhibit, it's
3 page 6, heading is Attachment B, and it has five
4 numbered requests that are document requests.

5 Have you seen this before?

6 A. Let me look for just a second.

7 Q. Of course. If you need me to Zoom in or
8 manipulate the document in any way, let me know. I'm
9 happy to do that. And you can take all the time you
10 need to review all this stuff.

11 A. (Reviewing document.) Yeah. I -- yeah. So
12 what was the question?

13 Q. Have you seen this before?

14 A. It looks familiar.

15 Q. Okay. Did League of Women Voters of Texas
16 produce all documents that were responsive to these
17 requests?

18 A. Yes, we did.

19 MR. HILTON: Okay. Great. All right. I have
20 one more I want to go ahead and attach as an exhibit to
21 the deposition now before I forget. I think we're up to
22 Exhibit 6.

23 (Defense Exhibit No. 6 was marked for
24 identification.)

25 MR. HILTON: Q. I have on the screen a

1 23-page document. On the first page, it's titled
2 Plaintiffs' Original Complaint.

3 Have you seen this document before?

4 A. Probably.

5 Q. I believe this is one -- I believe you have a
6 copy of this document in front of you, either
7 electronically or in paper. I believe counsel provided
8 that to you before the deposition started.

9 Do you have that?

10 A. Yes.

11 Q. Okay. So you can refer to that copy.

12 Mimi, you gave her the file-stamped copy that
13 is identical to this file-stamped copy?

14 MS. MARZIANI: Yes.

15 MR. HILTON: Yes, perfect.

16 Q. You can refer to that copy whenever I'm
17 talking about the complaint. I'm sure it will be easier
18 for you to do that than for me to share it on the
19 screen. But if you would like me to share it on the
20 screen, I'm happy to do that. Whatever is easier.

21 A. I just need to make the Zoom smaller and so I
22 can open up the document. Is that okay with you?

23 Q. Of course. Whatever you need to do on your
24 own, absolutely.

25 A. All right. I'm making the Zoom smaller. Then

1 what is the name of this document? Mimi, would you --

2 MS. MARZIANI: I sent it to you in the second
3 e-mail this morning, and it should be titled
4 "Complaint."

5 THE WITNESS: The second e-mail?

6 MS. MARZIANI: Yeah. It says, "No. 1,
7 Original Complaint."

8 THE WITNESS: Ah-ha. Thank you. That's
9 really helpful. Okay, so you want me to have that up.
10 Okay, thank you. I got it. Let me make sure it's the
11 same thing. Yes. Chris, I have it up on my screen.

12 MR. HILTON: Q. Okay. Fantastic.

13 Have you seen that document before today?

14 A. Yes.

15 Q. Did you review it before it was filed?

16 A. Yes.

17 Q. And you're aware that League of Women Voters
18 of Texas is a plaintiff in this case, and there's a
19 number of allegations related in this complaint related
20 to the league?

21 A. Yes.

22 Q. Are you prepared to testify about those
23 allegations today?

24 A. Yes.

25 Q. Okay. Great. I'll go ahead and stop the

1 screen share so you don't have to watch my scrolling
2 back and forth. All right. I'm going to ask you some
3 questions about that in a little bit. I'm going to
4 leave that to the side now.

5 I guess I'll ask you this: How much time did
6 you spend reviewing this complaint before it was filed?

7 A. Oh, I discussed it with the lawyers, and I
8 read it, and I reviewed it. How much time? Probably a
9 couple of hours.

10 Q. That's fine.

11 How much time did you spend -- I think you
12 said you met with your lawyers on two occasions before
13 this deposition. How much time did you spend talking
14 about the deposition with them?

15 MS. MARZIANI: I'm going to object to any
16 response that would be privileged.

17 Grace, you can answer as to the time, but not
18 to the content of any conversations.

19 MR. HILTON: Thank you for reminding me. I
20 should have clarified that.

21 Q. I'm not asking for any content of any
22 communications between you and your attorneys. I just
23 wanted to know how much time you spent meeting with them
24 in preparation for this deposition.

25 A. So last week, I spent probably an hour and a

1 half, two hours, I think, meeting with them via a Zoom
2 call. I would have to look at my calendar to find out
3 exactly what time and whatnot.

4 Q. That's fine. I think you said you met with
5 them yesterday or this morning as well?

6 A. This morning. I talked to them for about
7 45 minutes.

8 Q. Okay. That's all helpful. I appreciate that.

9 Now, I would like to turn over to the Bates
10 stamped documents that were produced. I want to start
11 with the file that contains Bates Nos. 1 through 327.

12 A. Okay.

13 MR. HILTON: I'm going to make this the next
14 exhibit to the deposition, Exhibit 7. I haven't been
15 able to send that file to the Court Reporter yet. But I
16 think we all have a copy of the same exact file, and
17 we'll be referring to it by Bates numbers.

18 THE WITNESS: Mimi, would you tell me which
19 one it is, what name it is?

20 MS. MARZIANI: Sure. This is the first e-mail
21 I sent you this morning. And it's called, "Stringer 2,
22 League of Women Voters of Texas depo production, 1
23 through 327." It's a long pdf document.

24 THE WITNESS: Okay. I got it.

25 MR. HILTON: Great. And that's what will be

1 the next exhibit. I think we're on Exhibit 7 to the
2 deposition. It's League of Women Voters of Texas
3 LWV-000001 through LWV-000327. That's this exhibit.

4 A. Yes.

5 (Defense Exhibit No. 7 was marked for
6 identification.)

7 MR. HILTON: Q. All right. So just to give
8 you an idea of kind of where we're going, everything up
9 to this point was just kind of some background
10 introductory stuff that I needed. Next, I'm going to
11 ask you to walk me through these documents, and I'll ask
12 you specific questions about each of them.

13 Then we're going to go back to those topics,
14 and I'm going to ask you some questions about the
15 topics. We'll talk a little bit more about the
16 documents and maybe some of those other exhibits, and
17 then that should be about it for the day. I may have
18 some cleanup questions at the end. So just to give you
19 an idea of where we're going.

20 A. M-hm.

21 Q. So let's start with Bates No. 1, LWV-000001.
22 It's titled "2018 Impact Report." Can you tell me what
23 this document is, what it shows, and just kind of walk
24 me through it?

25 A. This is a 2018 annual report. So every year,

1 we try to make a report of all the things that we
2 accomplished and what was notable in that year. We put
3 it out I think around Christmastime. We have it
4 accessible to anybody on the LWVTexas.org website.

5 And sometimes we print some and provide it to
6 people to explain what it is we do, and sometimes we
7 provide it to people trying to get them to make the
8 donations.

9 **Q. What's explained in this report?**

10 A. Okay. Okay. This is a 2018 Impact Report.
11 So what was great is that it was showing that the --
12 this "Bigger, Better, Bolder!" section is showing that
13 we have new leagues developing, and we're getting new
14 members. The Montgomery, Fort Bend, Lavaca and Bell
15 County in that particular year. So that was exciting
16 news.

17 All the -- all the leagues in Texas, local
18 leagues in Texas are listed on the right-hand side. So
19 those are different leagues. And there's two types of
20 different of leagues. One is a league which is sort of
21 an independent league, and they have their own bylaws.
22 The other one is a unit of the Texas league, which means
23 they use our bylaws and our policies and procedures.

24 I'm just giving you some background
25 information. So there's two different types of leagues.

1 **Q. That kind of background information is**
2 **helpful. I really appreciate that.**

3 A. Right. And so most of the time the
4 leagues-at-large, which are the units of the Texas
5 league are either new and they're just getting their
6 feet wet and getting started. And so we provide them
7 all the background and structure in membership and all
8 that stuff. Or they are small, and they're providing a
9 service to their community, but they have -- they don't
10 have enough members to do all the work it takes to be an
11 independent league.

12 There's not any rule about how large you have
13 to be to become an independent league. It all depends
14 on how much work your volunteers want to do. So let's
15 see. So this year is interesting because it was talking
16 about the legislative session; right? I think.

17 **Q. And just to -- one question about that.**

18 **Are legislative session years busier for ya'll**
19 **like they are seemingly for everyone in the state, or is**
20 **your activity not really affected by legislative**
21 **session?**

22 A. Really hard. Thankfully, whenever --
23 thankfully, in Texas, it only lasts for five months
24 unless they have a special session. But yes, it is --
25 we are very active supporting our positions. All the

1 positions come from studies that the League have done
2 over the years, and we come up with position statements.

3 Those are created by the membership at the
4 grassroots level. And then at the state level in the
5 legislature, we support those positions. So this right
6 here is talking about advocacy. And Cinde Weatherby did
7 voting rights and election law. Stephanie Swanson did
8 redistricting. Gloria did immigration. Celia Kaye is
9 wonderful. She took over child health from me.
10 Woo-hoo! And so she was doing that.

11 And then we have all volunteers. So these
12 people, there's more of them, and they write the
13 testimony, and they provide it at the legislature, and
14 then they -- we have volunteers who read the testimony.
15 And we try to -- we try to be factual and data-driven
16 and provide information that legislators would need to
17 make good decisions.

18 This page, that picture there is a picture of
19 the Fort Bend League, which is a league-at-large, and
20 they are a new league-at-large. And they are meeting
21 the needs of their incredibly diverse community there in
22 Fort Bend, which is I believe the fastest growing or the
23 most diverse, or something like that, town.

24 **Q. I think it's both actually, yeah.**

25 **A.** Yeah. And they're just an amazing group of

1 people. And so I love that picture just because it
2 shows -- it's a typical example of what it looks like
3 where people are registering people to vote. I don't
4 know exactly where it's at, but it looks like it's
5 either at a high school or a college.

6 So then we tried to figure out -- sorry, you
7 asked me to go through it, so I --

8 **Q. No. This is great. This is exactly what I'm**
9 **hoping for. I think this is the most efficient way to**
10 **go through these. And if it's all right, I'll ask you**
11 **specific questions like I've been doing. This is**
12 **working great for me as long as it's working for**
13 **everybody else and you.**

14 A. All right. Apparently that year there was a
15 record-breaking number of registered voters in Texas. I
16 feel like a lot of that is in the communities we serve
17 is what we're doing. We're in high schools, community
18 colleges and many, many community events, and we
19 registered thousands and thousands of voters.

20 And we're not just in large communities, but
21 small communities, and each community is different
22 according to the, you know, rural versus urban. It's
23 just different. Everybody is different, has different
24 ways of serving their communities.

25 VOTE411 is an online version of the Voters

1 Guide. And every year, more and more people are using
2 it. More and more voters are using it. So this is a
3 map that shows where people are using it, which I think
4 is fascinating because we're reaching more than just the
5 places we have the leagues, but outside all across
6 Texas, too.

7 So apparently during that election, which was
8 November 2018 election, 800,000 voters read the Voters
9 Guide. And that's the pdf of the Voters Guide, the
10 Voters Guide in libraries across Texas and the Voters
11 Guide created on online, that VOTE411. So anyway.

12 We send the Voters Guide out to libraries
13 across Texas. That's a quote. These are some young,
14 young people. They were our interns. We do -- we have
15 a high school voter registration education that we do
16 called BeATexasVoter.org, which is a civics curriculum
17 that we have. We work with principals across Texas.

18 We are very -- what's it called? -- respected
19 as a nonpartisan organization so that schools feel very
20 comfortable having us be in their schools providing high
21 school voter registration in high schools and colleges.
22 People know that we're never going to be partisan. We
23 just don't do that. "Better technology," this is just
24 showing the number of people who follow us on Facebook
25 Twitter, texting, YouTube.

1 **Q. Looks like we talked about pages 1 and 2 -- or**
2 **Bates Nos. 1 and 2, and we're on 3.**

3 **Please continue.**

4 A. We are a part of the Texas Election Protection
5 Coalition, which has a variety of folks, including the
6 Texas Civil Rights Project, the ACLU, I don't know,
7 different groups. And others in our -- this is League
8 of Women Voters Hays County.

9 This is in San Marcos, that picture of the
10 students is at San Marcos. There were very long lines.
11 And the League members in Hays County noticed it, and we
12 took action and tried to get it so that voters -- those
13 student voters wouldn't be disenfranchised and would be
14 able to actually cast their ballot.

15 We also -- so we had volunteers with the
16 Election Protection across Texas, many of our League
17 members did that.

18 This is the money financial report.

19 **Q. That's on Bates No. 4?**

20 A. Yeah, okay. You keep up with that.

21 And so there's LWVTX and LWV Texas Education
22 Fund. These are the combined income and combined
23 expenditures. So you can see that citizen education is
24 one of the highest expenditures here.

25 And what is interesting is that -- I think

1 it's fascinating -- is that we're able to do all of this
2 with such a little amount of money because we are a
3 grassroots, all-volunteer organization. So that's one
4 of the reasons why I think people would be as astounded
5 about how well we use our money.

6 Income, just shows most of the money comes
7 from individual donations, and then some of the money
8 comes up because when people join the League, they
9 join -- some of the money that comes in when they join
10 at the local level goes to the state and goes to
11 national because it's a three-tiered organization.
12 Everybody belongs to the same organization, but that's
13 how I'm able to -- I get money even though there's only
14 ten people on the board, all the leagues' members
15 support the organization? Does that make sense? I hope
16 so.

17 **Q. It does. Can I pause you right there and ask**
18 **a couple questions about that?**

19 **So you mentioned it's a three-tier**
20 **organization. What does that mean?**

21 **A. I don't know if it's everybody else uses that**
22 **terminology. But it means when people join the League,**
23 **they normally join at the local level.**

24 **I'm going to move this over so I can see your**
25 **face. It's easier to talk to a person.**

1 So they normally join at the local level, and
2 when they join, they pay -- they pay something called, I
3 don't know, they pay money. And at the end of every
4 year at a specific date, then the local leagues have to
5 pay money up to state and up to national because all the
6 members are all a part of the same organization, and
7 that's how the membership is paid.

8 Does that sort of make sense?

9 **Q. Yeah. I think so. It's like a membership**
10 **dues or something similar?**

11 **A. It's not dues. It's called per-member**
12 **payment. So often use the acronym PMP. So dues would**
13 **be on top of the per-member payment. Per-member payment**
14 **means you have ten members, so you have to pay a certain**
15 **amount of money to the state league for those ten**
16 **members into the national league for those ten members,**
17 **and that's a per-member payment.**

18 Dues would be on top of the per-member
19 payment. So say like I joined as a family, and my whole
20 family is a member, and then so there's two people, two
21 per-member payments. And then I pay extra. That's kind
22 of like dues or I want to give a donation. That's an
23 extra fee that goes to the local league. It's not dues.
24 It's a membership organization, so people pay a
25 membership fee when they join.

1 Q. Okay. And that's the per-member payment is
2 the membership fee when they join?

3 A. Yes. When they join and that they pay every
4 year. It's an annual membership. It's not a lifelong
5 membership.

6 Q. Got it. It sounds like a portion of those
7 per-member payments, those are paid to the local group,
8 branch, whatever group.

9 A. Yeah.

10 Q. A portion of that gets remitted to the state
11 level, and then a portion of the state level funds gets
12 remitted to the national?

13 A. Perfect. Yes. That's my understanding.

14 Q. Then are the dues on top of that mandatory, or
15 is that a yearly thing? What does someone get for their
16 dues, I guess?

17 A. I think, so the dues would be something that a
18 local league would decide to do. An independent local
19 league may have dues of \$20, and that would be kept at
20 the local level. And they would use that to help pay
21 for their meetings, pay for their voter education, pay
22 for their printing, pay for their facilities that they
23 needed to rent in order to provide forms or voter
24 education, or it might pay for transportation to and
25 from events, bumper stickers.

1 Stickers, I love stickers.

2 Lots of voter education materials mostly is
3 what it goes to. And then the things that you need like
4 the bags to carry it with and the screen things that you
5 set up to say that you're here and things to hold all
6 the materiels and coverings for the tables. And then we
7 do videoconferencing, so we have the pyramid things you
8 put your phones on and stuff like that.

9 And dues at the local level, they get to keep
10 some of the per-member payment, and they use the dues
11 plus that in order to pay for a lot of that. And then
12 they have to -- it's called development where they try
13 to get people to make donations so they can pay for
14 things such as the printed Voters Guide. Printing the
15 Voters Guide and doing the translation is very
16 expensive. Doing -- that's what we do.

17 Q. Can I ask you a question about printing the
18 Voters Guide?

19 A. Yes, sir.

20 Q. Is that an expense that would be reflected on
21 Bates No. 4 in that portion of the -- portion of the pie
22 chart, I guess, that refers to "Citizen Education"? Is
23 that where that is reflected?

24 A. I would presume that -- and I am presuming
25 because I did not make the pie charts; the treasurer

1 did. I am presuming yes, citizen education would also
2 cover the Voters Guide, which is one of our big
3 expenses.

4 Q. What are some of the other big expenses, and
5 to the extent you can give me an idea of what percentage
6 of your overall expenses they account for? So, for
7 example, you mentioned the Voters Guide is one of the
8 big expenses. Do you have an idea of how much or what
9 percentage of your expenditures are the Voters Guide or
10 account for printing the Voters Guide?

11 MS. MARZIANI: Objection to form.

12 Chris, do you mind stepping back and just
13 unraveling that question? That was a pretty compound
14 question.

15 MR. HILTON: Q. You mentioned that printing
16 the Voters Guide is one of your big expenses. Do you
17 know how much is spent on that and what percentage of
18 your total expenditure that represents?

19 A. I wouldn't know without looking at -- I mean,
20 just looking at this chart, but I wouldn't know without
21 looking at exact, you know, data from the treasurer.
22 Because the Voters Guide -- the Voters Guide also
23 includes to be a part of VOTE411, which is -- there's a
24 lot, a lot in it, and I don't know what the percentage
25 of it is.

1 But the VOTE411 at the state level during the
2 presidential year elections, we pay for all the local
3 leagues and leagues-at-large to be -- to have an online
4 Voters Guide, which is VOTE411. That costs, I believe,
5 \$7,000.

6 And then we also at the state level, we print
7 the Voters Guide. We translate the Voters Guide. We
8 pay for people to make it look nice, the design, and
9 then we pay for it to be mailed to libraries across
10 Texas along with any other place.

11 And then at the local level, many of the
12 larger leagues will also print a Voters Guide. So like
13 San Antonio, Austin, Houston, Dallas, they'll also print
14 their own Voters Guide, which includes ours, but also
15 includes, goes all the way down to the local level. So
16 it is -- that is -- they pay for that because they're an
17 independent local league, so they earn the money and try
18 to pay for that just like we earn the money and try to
19 pay for that. It's subsidized by us, but then they earn
20 extra money.

21 Does that make sense?

22 **Q. I think so. Who puts together the content of**
23 **the Voter Guide?**

24 A. So there is a policies and procedures
25 guidebook and other things. We have somebody who is

1 called -- each league has somebody who is called a voter
2 services person. And they are the ones who send a
3 letter out to -- first, we have to figure out who the
4 candidates are and that we're serving and for what our
5 region is, who the candidates are.

6 Then we have to get all their contact
7 information. We have to send them a form letter that
8 says who we are and what we're doing. It gives them a
9 link where they can upload their own answers to the
10 questions, which are on VOTE411, which is the online
11 Voters Guide. And then the -- then we take those
12 answers and we don't change anything unless it's, you
13 know, unless -- there's a few times we change something,
14 but very rarely.

15 Then we take those, and we use them in the
16 printed guides. So it's the printed guides and VOTE411
17 are mostly exactly the same, at least the answers to the
18 candidate questions. We have -- we get together and
19 come up with the questions that we're going to ask
20 candidates. The local leagues come up with the
21 questions they are going to ask the local candidates,
22 and the national league board comes up with the
23 questions for the national candidates.

24 Is that okay?

25 **Q. That was fantastic. I really do appreciate**

1 all the explanations.

2 The Voter Guide is available -- I think you
3 said this -- is available on your website or on the
4 local leagues' websites as well?

5 A. Yes. So I have a page on the local website --
6 on the Texas website called -- and I changed the name of
7 it for each election. That page has the Voters Guide
8 along with a page called Voters Guide, which also is
9 updated for every election that has more information
10 about the Voters Guide along with all of the previous
11 Voter Guides we have put together for the state.

12 Q. That is my next question, if previous ones are
13 available. So how far back, if I wanted to see a Voters
14 Guide from three years ago, would that be online?

15 A. No. It would be farther back than that, but I
16 would have to get on my website to see how far back I
17 have found them. If I found them farther back, then I
18 just put them up there because I think it's interesting.

19 Even the Voters Guide also has voter
20 education. So not only does it have what the candidates
21 input, but we also provide voter education on how to
22 register to vote, how to sign up for text voting
23 reminders, how to vote by mail, voter i.d. information.
24 All that information is also translated into Spanish so
25 we're providing a service not just for the

1 English-speaking voters, but also for people who prefer
2 to read in their -- they're more comfortable reading in
3 a different language.

4 **Q. And I think I heard this, but I just want to**
5 **make sure. If I wanted to see ones going back to, let's**
6 **say 2018 through now, those historical Voter Guides,**
7 **those would be on the website?**

8 A. Yeah. If you go to LWVTexas.org and then you
9 go to -- wait a second -- you go to I believe it's
10 called Voters Guide. You go to that page. And then at
11 the bottom of it are the previous Voter Guides. It's
12 also on the page called under "League Members and
13 Archive." So we archive them in two different places.

14 **Q. Perfect.**

15 A. We put them there because we thought it was
16 important that candidates see we were asking nonpartisan
17 questions, and they could see examples of the way people
18 answered so that they can try to provide a good answer
19 for the voters that they're trying to reach.

20 **Q. Great. I have one more area that I would like**
21 **to ask you about on this 2018 Impact Report.**

22 A. Okay.

23 **Q. Going back to page 1, Bates No. 1.**

24 A. Just a second. Page 1. Okay, the one with my
25 picture?

1 Q. Oh, that is -- I should have realized that
2 before we started the depo, yes, the one with your
3 picture. So you talked a couple times about independent
4 leagues or other types. You said this was a list of the
5 leagues. Can you explain that again for me what an
6 independent league is, if there's another type of
7 league, and what the differences are?

8 A. So I call them independent leagues. The title
9 that is used mostly in the league is local league. And
10 local league would be one that has their own bylaws,
11 their own local policies and procedures. They may do --
12 and they're responsible for their membership signing up
13 and sending out reminders. They have their own bank
14 account. They turn in a 990.

15 I'm just trying to think of, you know -- they
16 are mostly in the areas of -- I mean, I could go down
17 the list and tell you which ones they are.

18 Q. Yeah, that would be helpful actually.

19 A. Really?

20 Q. Any other things you can think of would be
21 helpful?

22 A. Amarillo is a local league. Austin Area is
23 local league. Bay Area is a local league. Beaumont is
24 a league-at-large. It is a small league that serves the
25 Beaumont community, but it is so small, it doesn't have

1 enough members to support having membership, but a
2 treasurer and such like. So they -- so we have Karen
3 Kelly who does their membership, like sends out
4 reminders and encourages folks to continue their
5 membership.

6 We provide services to local leagues,
7 educational services to local leagues and to
8 leagues-at-large a little bit differently because they
9 need different education. But I encourage everybody to
10 consider themselves a league outwardly to the public,
11 that the public does not need to know they're a
12 league-at-large rather a league because they're
13 providing the same service to their community. Just, it
14 is my thing.

15 Beaumont is a league-at-large. Bell County is
16 a league-at-large. Cy-Fair is a league-at-large.
17 Collin County is a local league. Comal Area is a local
18 league. Corpus Christi is a local league. Dallas is a
19 local league. Denton is a local league. El Paso, local
20 league. Fort Bend County is a league-at-large. It's
21 fairly new.

22 Grayson County closed down recently because it
23 got too small, and they just couldn't continue serving
24 the members of their community. Hays County is a local
25 league. Hill Country is a local league. Houston Area

1 is a local league. Irving, local league.

2 Lavaca County is a very new local league.

3 They started off as league-at-large, and then figured

4 out how to become independent local league. Lubbock

5 County is a local league. Marshall/Harrison County,

6 they're a league-at-large. And they may have -- I think

7 they may have gone away in the next year or something

8 like that because it got too small.

9 Midland is a local league. Montgomery County

10 is new league-at-large, but they're a very fast-growing

11 one, and we hope they become an independent local

12 league. Richardson is a local league.

13 Rio Grande Valley is a small league-at-large.

14 San Antonio is a local league. Tarrant County is a

15 local league. Tyler/Smith County is a local league.

16 Victoria is a league-at-large. Waco Area is a

17 league-at-large. Wichita Falls is a local league.

18 Woo-hoo! And there's some new ones in the

19 next report.

20 **Q. We'll deal with those when we get there then.**

21 **I'm impressed you were able to rattle that off. I**

22 **appreciate it.**

23 **A. That's all right.**

24 **Q. So what's the relationship between the League**

25 **of Women Voters of Texas and the local leagues or the**

1 independent leagues? You touched on that a little bit.
2 Are they truly independent, or what's the nature of the
3 relationship?

4 A. No. We are all one organization. It's a
5 membership organization. They join at the local league,
6 but they have the services the state and national
7 league. We provide training. We provide education. We
8 provide resources. Sometimes we help pay for things
9 such as their online Voter Guide.

10 We have regional training where we go out to
11 the different parts of Texas, and we provide training to
12 them. At convention every year, the -- every other
13 year, every two years, we provide more training for
14 them. We have now -- now we have webinars where I
15 talked to all the presidents, and we share information.
16 We send out a newsletter that comes -- national sends a
17 newsletter. We send a newsletter. Local leagues sends
18 newsletters to their members because we're all members
19 of the same organization.

20 Yet the leagues-at-large are actually called
21 units of the Texas league. Some of these, like Houston
22 area, Hill Country area, cover many counties -- not
23 Houston but the Hill Country covers many counties, so
24 they will have units in their local league that those
25 members meet together because they're from that

1 community, like Gillespie County or whatever those other
2 counties, Bandera or something. And they meet together,
3 and they have local meetings about things.

4 But then when they go to their local -- then
5 they'll go to their local league meetings, and then
6 they'll come to the convention. And then they may go to
7 LWVUS convention. So it's all an up-and-down
8 organization.

9 The local leagues may have their own policies
10 and procedures. Most of them, many of them do. The
11 local leagues have bylaws. That's one of the main
12 things, we guide them through the bylaws. We look at
13 their bylaws. We provide suggestions for their bylaws.

14 We have -- local leagues may have their own
15 policies and procedures, but those don't -- they don't
16 go above ours. So our policies and procedures for how
17 to be nonpartisan are above theirs. And national
18 league's nonpartisan policies and how to do the Voters
19 Guide and guidance on how who speaks for the League,
20 that's above ours.

21 So that's when I say three-tiered
22 organization. We all are a member of one organization.
23 Local leagues may have different solutions at the local
24 level, and if it's not different -- if it's not opposite
25 than ours, then they can do that. But they can't do

1 things that are in opposition to what --

2 Q. They can't conflict or supercede or whatever?

3 A. Right. So anyway, so the national and the

4 Texas provides guidance to the local leagues.

5 Q. You said local leagues have their own -- their

6 own finances, their own bank accounts, and submit their

7 own tax paperwork?

8 A. Yes. They do their own 990s. What we do is

9 remind them to do their 990s, and we try to get them to

10 share their information with us.

11 Q. For the leagues-at-large, how is that

12 different?

13 A. Because they are a part of our league. They

14 don't have to do their 990s. They don't have to do

15 something else, like we still want them -- rats. I go

16 to my website. So what we do is have them fill out

17 something called an annual report, and they tell us

18 things like -- all of the Texas leagues do that, but the

19 local leagues have to also share their bylaws and stuff.

20 So what do the leagues-at-large have to do?

21 They also have to share, write something about their

22 nonpartisan policy saying that they discussed it at

23 their annual meetings so everybody understands what

24 nonpartisan means to them and makes sure we're all on

25 the same page.

1 And they also have to sign something saying
2 that they're not a candidate running for office. The
3 president and the voter services person are not allowed
4 to be running for office or running a campaign or doing
5 stuff that is obviously partisan. Other members of
6 those organizations -- of the, you know, just members
7 can do whatever they want, unless they're at a league
8 meeting.

9 Does that make sense? It seems intricate. It
10 is interesting. I think it's fascinating.

11 Q. Well, this is all very helpful for me to kind
12 of understand more about the organizational structure
13 and all that, so I do appreciate it. It's very helpful.

14 Let me ask you this: So if I join a, you
15 know, the third tier, one of these ones that is listed
16 here, Amarillo or whatever, if someone goes to join that
17 chapter or unit or locally, whatever it is, are they
18 just a member of that particular league, or are they a
19 member of all three tiers of the League?

20 A. All three.

21 Q. And who -- which of those three tiers is the
22 boots on the ground for things like voter education and
23 voter registration? Does that occur at all three
24 levels, or is that primarily on the third level where
25 that kind of boots-on-the-ground stuff happens?

1 MS. MARZIANI: Objection. Form.

2 MR. HILTON: Q. You can answer if you
3 understand my question.

4 A. Say it again. Say the question again.

5 Q. I'm just trying to understand at which of
6 these three levels the boots on the ground, you know,
7 voter registration, voter education, Get-Out-the-Vote,
8 those kinds of activities are occurring?

9 A. So you're saying three different things. So
10 when you say voter registration, then you're -- then in
11 Texas, we have in-person voter registration. So
12 in-person voter registration occurs person-to-person,
13 and that would happen at the local league level.

14 Then you said two other things. You said
15 voter education.

16 Q. And Get-Out-the-Vote, I think, were the other
17 two examples.

18 A. The voter education happens at all three
19 levels. It happens at the local level, because you got
20 to know how your government works and where your county
21 election administrators are, how to register your
22 county, and all that stuff. And they have their own
23 Voters Guide to cover their county stuff.

24 And then the Texas level, we do voter
25 education by providing voter education to the local

1 leagues, and we provide education on social media. We
2 provide the Voters Guide and do just a ton of voter
3 education statewide trying to go outside the bounds of
4 just the local league.

5 But we can't do in-person voter registration
6 because I'm sitting in Austin. And the national level,
7 too, does similar stuff.

8 Then you said one more word.

9 **Q. I think Get-Out-the-Vote.**

10 A. Get-Out-the-Vote, okay.

11 **Q. Is that a distinct category of activity?**

12 A. Yeah, it's different, because voter education
13 goes on all the time. The voter registration activities
14 and voter education activities, that is year-round.
15 Whereas Get-Out-the-Vote, yes, it ramps up more as there
16 are an election coming up.

17 So Get-Out-the-Vote, we have a whole section
18 on our website about it. We provide lots of resources
19 for the local leagues to use. Local leagues have their
20 own resources. We do lots of handouts. We do
21 PowerPoints. We do visits with new voters.

22 Just a huge amount of get out -- this is when
23 the election is; this is the last day to register; this
24 is the last day to turn in your vote by mail. That's
25 all social media. Then we do candidate forms, which is

1 really difficult during this time, but we're all
2 learning how to do things differently.

3 So yes, all three organizations do that, but
4 they try to meet the needs of the different communities
5 they're serving. Does that make sense? I hope so.

6 Q. Yep, great, fantastic. Again, everything, all
7 your explanation is very helpful. I'm totally -- I
8 think I'm understanding anyway, to the extent I'm
9 capable. So I appreciate that. All right. I think
10 that's all I have for the 2018 Impact Report. I would
11 like to go now to the 2019 impact report which starts
12 with Bates No. 5.

13 These should go faster as we go along. I'm
14 kind of asking you my other questions later as they come
15 up in conversations. We're getting through the course
16 of my outline earlier than I said. This won't be the
17 pace for the whole day is what I'm trying to reassure
18 you.

19 A. I put together the impact report, so I know it
20 pretty well. So it doesn't bother me at all. It's when
21 I haven't put it together that it would be harder.

22 So this is a 2019 impact report. It was a
23 huge year for us because it was our hundredth
24 anniversary. Woo-hoo!

25 Q. Congratulations.

1 A. The League came about through the suffrage
2 movement of women getting the right to vote. That was a
3 hundred years ago. So we had a huge celebration in
4 San Antonio where people came from across the state and
5 came and celebrated. That was a lot of fun.

6 So anyway, there's some pictures from that. I
7 think that's Senator Wentworth there -- I could be
8 wrong -- in between me and that's something -- okay.
9 Let me look at this. See, if you look over on the
10 right-hand side there, Williamson County became a new
11 league-at-large. So it increased, but some folks went
12 away. Oh, Marshall/Harrison County is still there right
13 now, so that's good. Okay. Sorry.

14 **Q. I was going to ask you. Are there any other**
15 **on that list that are new ones?**

16 A. I know Williamson County. Let me look and
17 see. Cooke County, woo-hoo, Cooke County. That's a
18 very rural area. Just really wonderful that people got
19 together and formed a league in that community. That
20 means they get more information about voting and
21 elections.

22 Let's see. Let me see if there's anything
23 else. Montgomery County was there last time. Looks
24 like Williamson and Cooke are the new ones there as far
25 as I can tell.

1 **Q. I'm flipping back between this and Bates**

2 **No. 1. Looks like Lake Houston is added to the list.**

3 A. Ah, Lake Houston. Yeah, that is a new league
4 too. Very small. Having a little trouble. We're
5 providing them with a lot of services to try to see if
6 we can get them going. It's a lot more work than people
7 realize. And they think it could just happen, and
8 really, serving the needs of your community is hard, and
9 we provide a lot of the support services for the
10 leagues-at-large.

11 Lake Houston is having some trouble, whereas
12 Montgomery County, which is right close by there, is
13 just thriving. It also depends on if there are people
14 in the community that have the time and energy and
15 interest in working on something like a league.

16 **Q. Are any of the ones that are new for 2019 as**
17 **opposed to 2018, would those all be leagues-at-large?**

18 A. Yes. They would all be leagues-at-large.

19 In Texas, we encourage leagues to form as
20 leagues-at-large because they get -- we provide their
21 membership services, and we help them more financially
22 and make sure that they can perform the things that they
23 need to perform in order to become eventually a local
24 league.

25 Like Lavaca County, since I've been on, is the

1 only one that's moved over and become a local league,
2 which is interesting because it's such a rural
3 community, but the women and men in it, mostly women,
4 are retired judges and retired -- they're just a very
5 independent, knowledgeable group of people.

6 So anyway. Anyway.

7 **Q. I think that's all the questions I had about**
8 **the new list of leagues.**

9 A. All right.

10 **Q. I guess if you could go back through the rest**
11 **of the report like we did before and give me the**
12 **highlights out of it. I don't need you to read from**
13 **everything on there obviously, but if you can tell me**
14 **the highlights on it, that would be helpful.**

15 A. This "Growing our grassroots base!" is just
16 what we've been talking about, how we provide services
17 to all the local leagues and communities across Texas.
18 If there's an interest, we provide them with the
19 knowledge and training. If they find at least five
20 interested people, then they can start a league. Right.
21 Right. So it shows metropolitan, suburban and rural
22 areas, which is important, and they're more diverse.

23 The Voters Guide was provided in Chinese and
24 Vietnamese this year because Houston or Harris County
25 translated, found some money to translate it. Then how

1 we promoted the Voters Guide, which is VOTE411, which is
2 that little purple logo thing.

3 The constitutional convention election is not
4 a hugely popular one. Like the last one had a lot more
5 people using the Voters Guide. This was really
6 important because this is the only resource for people
7 to be able to find information about the proposed
8 constitutional amendments.

9 So we can provide pros and cons, and I think
10 only 600,000 people or something in Texas voted in the
11 whole election, so 110 is not bad. I thought it was
12 pretty good.

13 "Fighting For Voting Rights," we took --
14 "Fighting Voter Suppression," that's something we're
15 always going to be different. That just talks about the
16 different legal cases. And "Action at the Capitol," so
17 while we don't take a -- we never support or oppose
18 parties, political parties or political candidates, we
19 do take action on issues we've studied and come up with
20 a position on.

21 So we created something we used to call
22 One-Click Politics. We got e-mails from constituents
23 out to the legislators. We provided 62 testimonies.

24 This is a picture -- oh, they're so cute. I
25 believe that might be the Corpus Christi League, but I

1 can't remember. They look like they're having fun.
2 They're registering voters. You can see the voter
3 registration signs, "I can help you register," the
4 League shirts. I think that's a Corpus Christi League.

5 Sorry. I like these things. I think they're
6 fascinating. Okay. And I can talk about this all day
7 long, so you have to be careful.

8 **Q. Noted. I will let you know.**

9 A. Okay. So we'll move on from that.

10 That just -- the League's Get-Out-the-Vote
11 campaign. It's on our website. It's research-based.
12 It's about how to talk to, how to provide accurate,
13 nonpartisan, easy-to-understand voter education in a
14 positive manner to encourage future voters to make a
15 plan to vote.

16 So when we talk about Get-Out-the-Vote, it's
17 not about harassing people or telling people who to vote
18 for. It's about educating people how to register, how
19 to vote, how to make a plan to vote here in Texas
20 because every place is different.

21 Okay. Sorry.

22 "Building Partnerships in Voting Rights!," so
23 we try to -- we try to work with nonpartisan
24 organizations as much as we can. Fair Maps Texas is
25 about redistricting. This text thing, "Text LWVTX to

1 80123," we send voter education about elections, all
2 nonpartisan. There's a separate one they can ask to
3 sign up for for advocacy if they wanted to, but we keep
4 it completely separate. We don't tell people to vote
5 based on some issue.

6 "By the Numbers," so we created 16 YouTube
7 videos. We had some interns, and they helped me create
8 ten constitutional amendment videos. Those amendments
9 were really exciting, I'm telling you. The best one was
10 a dog one. I really like the dog one.

11 **Q. What's the dog one? I'm not familiar.**

12 A. The dog -- so for some crazy reason, Texas
13 considers sheriff dogs and police dogs to be property.
14 That meant that when the sheriff's dog or horse or
15 whatever retired, that they had to put them up for
16 auction just like they do with office chairs and stuff.
17 So you have to sell it.

18 So sometimes the handlers wanted to have the
19 dog, but they couldn't. They had to go through the
20 auction process. And that was just a stupid -- because
21 of our constitution -- you're a lawyer, not me -- the
22 way it set up, you had to make a constitutional
23 amendment to change that law so the dogs could be given,
24 allowed, the handlers could adopt the dogs without
25 having to pay for them. Stupid.

1 Q. I must have missed that day in law school. I
2 don't know.

3 A. There were 10 constitutional amendments. So
4 we made videos we made promoting voting. We did two in
5 Spanish.

6 Q. Is there -- do you know what the YouTube
7 channel is offhand? I'm sure there's a link on the
8 website if I wanted to check out those videos.

9 A. Yeah, the link is on the website. Or you can
10 just Google LWV Texas YouTube, and it will take you over
11 there.

12 Q. And I'm sorry, another question occurred to
13 me. What are some of the other issues that are going to
14 be, you know, part of these efforts that you put
15 together every year? When you're putting together an
16 issue guide, what are the kinds of issues you're putting
17 in there?

18 A. So when you're talking about issues, you are
19 talking about things we're fighting for in the Texas
20 legislature?

21 Q. Sure. I guess my question is both, in the
22 legislature or any sort of voter-facing material you
23 guys put out.

24 A. We don't -- we don't -- so during an election
25 time, we keep issues separate because if you say to

1 somebody, "You need to vote for candidates who support
2 Medicaid or Medicare For All," or something, you're
3 telling people who to vote for. We don't do that. So
4 we can't say that. Okay.

5 Does that make sense? There's a difference.

6 So we don't tell people to vote based on an
7 issue except for maybe vote for public safety or
8 something like that, something generic where it is not
9 pushing a voter towards or away from a candidate or a
10 party.

11 **Q. M-hm.**

12 A. Does that make sense? That's what we do.

13 **Q. I think so. That sounds like it might be**
14 **different for legislative activities?**

15 A. So there is Get-Out-the-Vote and voter
16 education. And then on a separate -- in a separate
17 thing, it's called advocacy, and it's also called
18 program. And we have on our website, if you go to it,
19 it's under "Advocacy and Issues."

20 So we have volunteers who follow certain
21 positions, and the positions are created through -- it's
22 a two-year study to come up with a position, because
23 that's who we are. Positions are grassroots led so that
24 the members all across the state study a position, and
25 we provide them with information, and they have

1 meetings.

2 And one of the last ones we did was human
3 trafficking. And then another one was -- what is that
4 called -- payday lending. Payday lending, okay. So all
5 the leagues across the state would study those issues,
6 and then we would do something called -- where we get
7 together, and they decide what the statements are going
8 to be about those positions.

9 And then they wordsmith them as a group, and
10 everybody gets together as a group. That's why the
11 two-hour convention took six hours because of
12 wordsmithing and how words are really important and that
13 this is not a top-down organization. It's a grassroots
14 organization where they come up with the words that are
15 used in our positions.

16 So anyway, it's interesting.

17 **Q. So I'm sorry, go ahead.**

18 A. You tell me. Now I've lost track as to what
19 the question was.

20 **Q. That's all right.**

21 So when you're putting together those kind of
22 statements, I would imagine part of the work is trying
23 to keep it nonpartisan as well?

24 A. No.

25 MS. MARZIANI: Objection. Form.

1 THE WITNESS: So what does that mean?

2 MS. MARZIANI: I was objecting to the form
3 because it is vague. But Chris can re-ask.

4 MR. HILTON: Q. Yeah. Any time that your
5 attorneys object, you can still answer the question if
6 you understand it. Usually when Mimi says, "Objection,
7 form," it's because my question was not a very good one.
8 So you may not understand, and you can ask me to
9 clarify. That's fine.

10 A. Okay.

11 Q. So let me try better this time.

12 How does that -- let me ask it this way: How
13 does that process of putting together a position on an
14 issue, how do you maintain a nonpartisan view when
15 you're going through that process?

16 A. Well, our issues -- issues are issues. They
17 aren't necessarily -- maybe candidates or folks can try
18 to make them seem partisan, but they're actually a
19 position on an issue. And we may have had the position
20 on an issue for 20 years. Right?

21 As an example, the issue that people bring up
22 a lot is the women's health, choice or abortion.

23 Q. Been in the news a lot over the past few
24 weeks.

25 A. All right. The issue -- that is an issue.

1 Candidates and parties have changed over the years. We
2 have not changed. Our position is the same as it was
3 when we studied it, and our membership decided on a
4 position. Our issue and our position is not partisan;
5 it is about the issue.

6 We happen to be a supporter of women getting
7 to make their own decisions about themselves. So
8 that -- if you look over the years, I understand what
9 you're trying to say is that is partisan. Well, but
10 Republicans 30 years ago didn't think it was partisan.
11 They have a personal opinion about it. So we're not
12 being partisan when we take a position.

13 What we are is that we are being deliberative.
14 You should have been at that six-hour meeting. We study
15 subjects. We wordsmith. We do -- there's some word for
16 it where everybody talks and talks and talks until we
17 come to consensus. Right?

18 It's really interesting and fascinating. It's
19 very democratic. It's very grassroots. And it's not
20 about red, blue, green, whatever that other thing is.
21 It is just very fascinating.

22 Although people say you have this position,
23 that means you're for this, even candidates are all over
24 the map on most positions: immigration, healthcare.
25 Whole states -- so anyway, that is --

1 Q. I think I understand what you're saying. I
2 want to be clear I'm --

3 A. I can talk more.

4 Q. -- not trying to accuse you of being partisan
5 or anything like that.

6 A. Right.

7 Q. I'm really just curious as to how you try
8 to -- what kind of nonpartisan, being nonpartisan means
9 to you and how you maintain that. That's all I was
10 trying to ask, and I do apologize --

11 A. So we would go during the legislative session,
12 and we can talk to Republicans. We can talk to
13 Democrats. We can talk to whoever. Folks who support
14 us in one area may not support us in another area.
15 That's why it's important for us to stay nonpartisan and
16 talk about the issues and not about the party and that
17 stuff.

18 So we try to be very -- we are very
19 nonpartisan in our method. Nonpartisan for us means we
20 never support or oppose political parties or political
21 candidates. That doesn't mean we're not out there
22 working on issues that are important to us, and child
23 health being one of them, and public education being
24 another. If you go to our website, you can see all the
25 different work we've been doing.

1 Q. I appreciate that.

2 I guess one last question on the topic, just
3 to make sure I'm understanding it, is it -- sorry -- I'm
4 trying to think of how to ask it. I guess what I hear
5 you saying is there are issues where you take positions
6 on a variety of issues. Opposing candidates may agree
7 with you on one issue and disagree with you on another
8 issue. Folks of both parties may agree with you on some
9 issues and not on other issues.

10 Is that a fair characterization? Am I
11 understanding that correctly?

12 A. Advocacy is about the issue. It's not about
13 the person or the candidate or the party for us.

14 Q. And in your experience, folks on both sides --
15 or however you want to phrase it -- will agree with you
16 on some issues and not others?

17 A. Absolutely.

18 MS. MARZIANI: Objection. Calls for
19 speculation.

20 MR. HILTON: Q. All right. Thank you for
21 that explanation. Again, I was just -- I was truly
22 curious about how you view being nonpartisan and how you
23 approach it. So I do appreciate that explanation.

24 MS. MARZIANI: Hey, Chris, so we're getting
25 towards the lunch hour. Do you have a sense of when we

1 might be at a good time for a break for lunch?

2 MR. HILTON: Whenever ya'll want. I'm the
3 kind of person who will power through until I'm told to
4 stop. So I hadn't even looked at the clock honestly.
5 Yeah, we've been going for quite awhile. If you would
6 like to take a break and we can come back later, we can
7 do that. If you'd like to power through, we can do
8 that. It's your show, so it's up to you.

9 THE WITNESS: Up to you, Mimi.

10 MS. MARZIANI: Why don't we -- we have been
11 going for quite awhile. Why don't we take a fairly
12 short break to let people stretch their legs and maybe
13 grab a bite to eat, and we can come back at 12:15, a
14 20-minute break.

15 THE WITNESS: Yeah. That's fine.

16 MR. HILTON: I think that works. Can we push
17 it to 12:20, and maybe I can make sure my
18 eight-month-old hasn't driven my wife to the brink this
19 morning.

20 MS. MARZIANI: Of course. Of course. If you
21 need more time, Chris, just let me know.

22 MR. HILTON: I'll e-mail you if we need to
23 change the time. Let's call it 12:20.

24 MS. MARZIANI: Thank you.

25 THE WITNESS: Chris and Mimi, I'm going to

1 leave the meeting, and then they'll let me back in?

2 MR. HILTON: Let's go off the record,
3 Kimberlee.

4 (The lunch recess was taken at 11:56 a.m.)

5 AFTERNOON SESSION

6 (Time noted: 12:27 p.m.)

7 MR. HILTON: As we've done with other
8 depositions in this matter, all parties have agreed to
9 waive any read-in whenever we come back from breaks. So
10 just wanted to note that.

11 THE REPORTER: Mr. Hilton, were we going to
12 get other counsel's appearances, I thought?

13 MR. HILTON: Right. Thank you.

14 A couple folks have joined since we started.
15 If anyone else wants to appear for the record, now is
16 the time. I think on our end, Anna Mackin is on, at
17 least intermittently.

18 MR. COX: And Ryan Cox as well with the Texas
19 Civil Rights Project, C-o-x.

20 MR. HILTON: Q. Okay. Great. Then just one
21 more kind of administrative point.

22 Ms. Chimene, did you speak to anyone on the
23 break?

24 A. I talked to the lawyers for a few minutes.
25 And then I talked to my husband and daughter about the

1 dog.

2 **Q. Did you speak to your lawyers about the**
3 **substance of your testimony?**

4 A. I talked to the lawyers about --

5 MS. MARZIANI: Objection to privilege.

6 MR. HILTON: I think I have a right. I mean,
7 the witness is under oath, and the deposition is still
8 open, so I think I have a right to know whether you
9 discussed the substance of her testimony.

10 MS. MARZIANI: I'm going to object to any
11 discussion of the content of what we discussed with the
12 client.

13 MR. HILTON: Q. So Ms. Chimene, did you
14 discuss the content of your testimony with your lawyers?

15 A. Mostly just said I was doing a great job.
16 Content, I mean --

17 **Q. The substance of your testimony?**

18 A. Substance? Not specifics, just how I'm doing
19 mostly, I think. That's what I would say.

20 **Q. I think that's fine. You are doing a great**
21 **job, so I agree with your lawyers.**

22 **Did you review any other documents other than**
23 **the ones we've already discussed?**

24 A. No. I went and got a drink and an apple, and
25 that's it.

1 Q. Is the dog doing well?

2 A. The dog is asleep because he loves to torture
3 us in the middle of the night.

4 Q. My dog is pulling the same move these days.
5 All right. Let's pick back up. I think we're on the
6 2019 Impact Report.

7 A. Okay.

8 Q. And we had discussed quite a bit about the
9 League and answering tons of other questions, which
10 we'll get to skip that part I had later. This has all
11 been great. I think we were on -- I think we had
12 finished page Bates numbered LWV-000007, and I think we
13 were -- had not yet talked about page Bates No. 8.

14 So could we pick back up where we were, and
15 you were kind of running me through this document and
16 giving me the highlights. I'd like to pick back up with
17 Bates No. 8.

18 MS. MARZIANI: Objection as to form.

19 Is there a question in there, Counsel?

20 MR. HILTON: Q. I would just like to proceed
21 like we were doing where, Ms. Chimene, you were
22 explaining the document to me.

23 MS. MARZIANI: I would respectfully ask for
24 you to ask her a question to respond to.

25 MR. HILTON: Q. Ms. Chimene, can you please

1 explain page Bates No. 8 to me?

2 A. This page goes over the funding of the mission
3 just like in the last document. There's a "Citizen
4 Education," the "Administration." "Advocacy" is a
5 little higher because it was just the legislative
6 session. This tells you where the money is coming from.
7 To me, it's very similar to the other one, I think.
8 Yes. Yeah?

9 Q. I'm sorry, continue.

10 A. I was just going to go through the pictures.

11 Q. I would love to hear that, before I lose it, I
12 want to ask you questions about the expenditures pie
13 chart. I know you didn't put it together. But to the
14 extent you know, you talked a little bit about what
15 falls under each of these categories.

16 Could you please explain to me the type of the
17 expenditures that are represented by each category in
18 that chart?

19 A. I can give you a general idea. I didn't
20 create the chart. The chart came from the treasurer.
21 And expenditures. So this is the chart on the left-hand
22 side, LWVTX and LWVTEF. Looks like combined
23 expenditures was 202,345.

24 And "Events" would be a gathering of all of
25 the League members. At this point, it was probably for

1 the legislative session. We had a big education event
2 for all the members about advocating at the Capitol.
3 And we provided them with information on how to do that.

4 And "Citizens Education," this is what
5 probably what happened in the past, so it was probably
6 the money spent doing voter education, Get-Out-the-Vote
7 and the Voters Guide, and translation and all that
8 stuff.

9 "Administration" is probably the -- I don't
10 even know if we had the two people at that time. It
11 might be just one. It may be two of the people who work
12 for us. I don't know what "League Support." Must be
13 because the national league gave us money, perhaps. I
14 am guessing, though, because I don't know what she meant
15 by that.

16 "Advocacy" and "Fundraising" is when we sent
17 out like mailers out to try to get people to make a
18 donation. "Fundraising" would also include like this
19 report. This would be something we would have sent out
20 to people. Does that make sense?

21 **Q. It does. What is the name of the treasurer**
22 **who put this together?**

23 A. Her name is Miriam Foshay, F-o-s-h-a-y.

24 **Q. And are there other documents in what was**
25 **produced to us that explain in more detail these**

1 **categories of expenses?**

2 A. Yes. You can find more information
3 probably -- I would have to look to see, but in the
4 budget section of the convention work.

5 **Q. Great. We will get there.**

6 A. Probably the 990s or something. I don't know.

7 **Q. Okay. Great. And are there other records**
8 **that League of Women Voters of Texas has that would**
9 **reflect these things that haven't been produced to us?**

10 A. I'm sure the treasurer keeps really thorough
11 records, but -- you know, the bank statements and
12 records like that, you know, like a treasurer would
13 have. But to me, this is just a general overview.

14 **Q. Sure. Okay. That's the question I had or**
15 **those are the questions I had about that part of Bates**
16 **No. 8. Is there anything else you can tell me about**
17 **Bates No. 8?**

18 A. Cinde Weatherby testifying. These are our
19 interns. They're so cute. This is a photo from an
20 LWVUS event that we're allowed to use, that they have
21 permission for us to use. This is me testifying.

22 These are other interns. There's different
23 semesters, so there's different interns for each
24 semester. And they just did a great job. This is
25 Minnie Fisher Cunningham who was the -- she ended up

1 marrying Governor Hobby, and she was the first
2 president. I think she was a pharmacist and the first
3 president that got the women in the League of Women
4 Voters of Texas and continued fighting for voter rights
5 here in Texas. She was a really smart lady.

6 Let's see, these are the members of the board
7 at this time. They come from all over Texas. This is
8 the Texas board. After each name is the name of the
9 league that they come from. So we try, it's just all
10 over Texas.

11 **Q. M-hm.**

12 A. Some of them are leagues, some of them are
13 leagues-at-large. I happen to be from Austin. The last
14 president was from Dallas.

15 **Q. Gotcha.**

16 A. It's all a membership organization.

17 **Q. You mentioned interns a couple of times, and**
18 **one of these pictures here is of them.**

19 **Can you tell me about the intern program, like**
20 **where they come from?**

21 A. Well, my treasurer doesn't want me to call
22 them interns. They're really student volunteers because
23 we don't have enough money to pay them. We often give
24 them a stipend. We call it a stipend.

25 Some of them come from -- let's see. Some of

1 -- aww, they're so cute. Some of them come from --
2 Sophia is from ACC. And these other folks are from UT.
3 And these folks on this side are from UT, but they come
4 from all over the state.

5 Actually, one of them is a high school student
6 because we have a high school league in Austin. So she
7 helps me with the high school program. This other
8 graphic of the young lady holding the "VOTE411" sign is
9 from an event that happened someplace in the
10 United States where they got permission and took
11 pictures, and so we're allowed to use those photos.

12 **Q. How do the interns come to work for the**
13 **League?**

14 A. I have a page called like "Interns and
15 Volunteers" -- "Student Interns and Volunteers." I
16 think that in -- I don't know the difference that much,
17 but something to do with interns are doing this in order
18 to complete an assignment from their class, and the
19 volunteers are just folks who really care about whatever
20 is going on. Every semester is different as to what
21 they get to do.

22 **Q. That was my next question. What kind of**
23 **things do they do for the League?**

24 A. Okay. The picture on the left-hand side,
25 those four people, they did the video -- they studied

1 and helped, worked with volunteers or members across the
2 state to study the constitutional amendments. And they
3 wrote up the pros and cons, and they researched and
4 contacted different people, and then they worked with
5 their volunteer members.

6 They came up with pros and cons, and then they
7 created the videos, which were wildly watched across
8 Texas, on each constitutional amendment.

9 Does that make sense?

10 **Q. M-hm.**

11 A. On the right-hand side, what did those guys
12 work on? I can't remember what they were working on.

13 **Q. I was just going to say that's fine. If you**
14 **can't remember what these particular ones worked on,**
15 **just general description of the kinds of activities they**
16 **work on or maybe a couple of other examples that come to**
17 **mind.**

18 A. So the kinds of activities depends on the --
19 it depends on the election year, whether it's a
20 legislative session, and they work on more issue
21 advocacy stuff and education on that. And if it is an
22 election statewide or statewide elections or, yeah, one
23 of the scheduled elections -- sorry, I'm getting worn
24 after lunch. Maybe if I looked at you, I would be
25 better instead of looking at the form. There we go.

1 So everything is dependent on the election.
2 So they would probably try to promote voter education
3 and voter registration. They may create videos about
4 voting in elections at the statewide level, vote by
5 mail, different things like that. So actually you find
6 them on the YouTubes doing different things.

7 It's really interesting a process. And they
8 really learn a lot and have a good time. They also do
9 things for like newsletters that go out to all the
10 members. And they do great documents, voter education.
11 It just depends on what is the calendar year.

12 Some people say, "I really wanted to do
13 advocacy." I'm like, "Well, that's too bad. It's not
14 the legislative session, woo-hoo. You get to do voter
15 education."

16 And so it's all interesting.

17 **Q. All right. That's all I had on the annual**
18 **reports.**

19 A. Okay.

20 **Q. Next up, Bates No. 9. This is kind of the**
21 **beginning of all the tax forms. I think this will be**
22 **good news. I'm not going to ask you to go through these**
23 **in detail.**

24 A. Yeah.

25 **Q. I do want to have an understanding from you of**

1 what has -- what I have, what has been provided to me.

2 So...

3 A. Okay.

4 Q. Starting at Bates No. 9, and tax forms seem to
5 continue through Bates No. 131, so well over a hundred
6 pages of tax forms.

7 Can you tell me your understanding of what
8 documents are in that Bates range?

9 A. I can skim through them. If they say the
10 990-EZ, it is a form that we turn in -- (cellphone
11 interruption) -- sorry, let me just tell them to leave
12 me alone. How do I do that?

13 So if it's a 990-EZ, it's a form that we --
14 the treasurer puts together along with an accountant,
15 and we turn it in every year because we are an
16 organization. And I put the 990s on the website, so
17 anybody who wants to review them can. It is open to
18 everybody.

19 So I can scroll through here. Otherwise, it's
20 990s, looks like that was what? 2017. Oh, the 990s
21 have the names of the board members.

22 Q. Right. Let me ask you this.

23 A. Yes, sir.

24 Q. I see tax documents from both an entity that's
25 the League of Women Voters of Texas.

1 A. Yes.

2 Q. And the League of Women Voters of Texas
3 Education Fund.

4 A. Uh-huh.

5 Q. Can you explain the difference between those
6 two and their relationship?

7 A. Well, so let me look at you. Let me look at
8 your face. Okay.

9 So it was very interesting. Unfortunately,
10 let's see, we worked really hard because we were a
11 501(c)(4), which meant that people couldn't make a
12 donation to us and so because we didn't spend any money
13 on advocacy, we did not have to be a 501(c)(4).

14 And so the treasurer and some other folks led
15 us through a long process to become a 501(c)(3). So now
16 the League of Women Voters of Texas is a 501(c)(3).

17 Before -- and that happened at the 2018
18 convention.

19 Q. M-hm.

20 A. All the delegates, all the members who came
21 and the delegates came and voted on it. Before that,
22 the -- there was a division between 501(c)(3), which was
23 advocacy, and a 501(c)(4), which is voter education.
24 And the voter education is the Education Fund. So those
25 are the two things.

1 That meant two different budgets and two
2 different forms, and every time we spent something, we
3 had to figure out which one it went to, and I would let
4 the treasurer guide me on that. It was more complicated
5 than it had to be for our organization, so we decided to
6 transfer it over.

7 So we still do have an Education Fund, but it
8 is much smaller, and it mostly holds money for the
9 leagues-at-large who do not have a bank account and for
10 local leagues who may for some reason need an Education
11 Fund bank account.

12 Does that make sense? I'm really not an
13 expert at finances.

14 **Q. No. I understand. I think that makes sense.**

15 **Does the Education Fund engage in any activity**
16 **other than holding assets?**

17 A. Now it mostly holds assets, is my
18 understanding -- is my understanding. So it holds
19 assets for some of the local leagues, which we are in
20 the process of changing over to their -- some of the
21 local leagues are 501(c)(4)'s and changing them over to
22 501(c)(3)'s in a group exemption thing with the IRS.

23 **Q. And what about before the 2018 convention when**
24 **this change occurred, did the Education Fund have any**
25 **activities other than holding assets?**

1 A. Yes, yes. The Education Fund, it is how we
2 did the Voters Guide and forms and all of that stuff.
3 So I don't want to get into it too much because it was
4 never super clear to me.

5 **Q. So you weren't involved in the details of --**

6 A. Finances, no.

7 **Q. Can you explain again? I'm still unclear as**
8 **to why -- your understanding of why the change from a**
9 **(c)(4) to a (c)(3)?**

10 A. We did not need to be a (c)(4) because we
11 don't spend money, much money, according to the tax
12 rules. In my limited knowledge, we don't spend the
13 money on advocacy, and there is a certain percentage you
14 have to spend in order to meet some limit.

15 So LWVUS and LWV guided us through the
16 process, and we changed over, and we're helping the
17 local leagues change over, too. Also, it helps so that
18 when we say, "Please donate to the league" -- you know,
19 I am not the specialist in this tax stuff -- I think now
20 it can be taken off the taxes.

21 **Q. Okay. What can be taken off?**

22 A. You can make a donation.

23 **Q. Oh, okay.**

24 A. Donations, so people can make a donation, and
25 it can come off the taxes because it's a 501(c)(3). But

1 truly, I'm not an expert at this at all.

2 Q. I see. So the donations to the league are tax
3 deductible now that it is a 501(c)(3)?

4 A. Yes. Otherwise, they had to donate to the
5 Education Fund versus the League of Women Voters of
6 Texas.

7 Q. I see. And that part of the reason for this
8 was due to the level or lack thereof of expenses on
9 advocacy? Did I hear you say that?

10 A. That's my limited understanding of something
11 to do with taxes.

12 Q. But earlier on the 2018 and the 2019 reports,
13 there were categories labeled advocacy for expenditures.

14 A. M-hm.

15 Q. I guess what I understand you to be saying is
16 that the level of expenses was not sufficient to require
17 you to be a (c)(4)?

18 A. Right.

19 Q. Do I have that right?

20 A. Yes, sir.

21 Q. Okay. Was there any other reason other than
22 making the donations tax deductible for the change that
23 you're aware of?

24 A. Because our treasurers are volunteers, and it
25 is a lot of work to do this. So we're trying to make it

1 as easy as possible for our volunteers in all levels of
2 our organization. Yeah.

3 Q. Tax law was my worst grade in law school. I
4 regretted taking that class. So you're in good company
5 with me on that. Mystified by all this.

6 I guess what you're saying there is that it's
7 easier from an administrative burden standpoint to be a
8 501(c)(3) as opposed to a (c)(4)? Is that your
9 understanding?

10 A. It's easier to have one organization.

11 Q. Okay. Okay.

12 A. I don't understand enough otherwise. But now
13 I have one organization. You'll see a difference in the
14 convention budget -- yes -- in next year's annual
15 report, which I'll be happy to send you.

16 Q. Okay. I appreciate that.

17 And so I guess my last question to you so you
18 can answer it is, what's the -- about these two entities
19 and their relationship is -- let me start over. Let me
20 try it again.

21 What is the relationship now between League of
22 Women Voters of Texas and the Education Fund?

23 A. The League, they're still two different
24 organizations, and they have -- one has a bigger board,
25 and one has a smaller, more just functional board mostly

1 holding some funds that we use just for voter education.
2 Those funds, most of the time, come from some local
3 leagues that don't have their own 501(c)(3) because
4 they're still a 501(c)(4), and leagues-at-large, because
5 we get donations and we fund it to them that way.

6 It's just small voter education used mostly
7 for Voter Guides and voter education forms and anything
8 to do with voter education. So sorry, I wish I knew --
9 I wish I was better, but the treasurer could probably.

10 **Q. Understood.**

11 **Are you the president of both organizations?**

12 A. Um, I -- I was the president of both
13 organizations. I believe I am the president of both
14 organizations, but I would have to really look at it to
15 see what the structure is.

16 **Q. Is there more overlap in the board members**
17 **other than yourself?**

18 A. There are -- so the -- so the Education Fund,
19 is there overlap? There is some overlap but then we
20 have some people who are not on -- we don't have it
21 exactly the same. We have some extra people on it, if
22 that makes sense.

23 **Q. So there's some overlap, but not complete**
24 **overlap?**

25 A. Yes, sir.

1 Q. Okay.

2 A. The meetings are very short.

3 Q. Is the Education Fund owned by the League of
4 Women Voters of Texas?

5 A. It's an organization. Is it owned? I don't
6 know. Is our organization owned? I don't know. I
7 don't know what that means.

8 Q. Is there any formal relationship between the
9 two or --

10 A. I think it's -- oh, formal relationship? I
11 don't know.

12 Q. I don't want to keep going on if I've
13 exhausted your knowledge, which is fine. To the extent
14 we have other questions about just kind of the
15 structural kind of stuff, can we ask you that separately
16 and get those answers from you?

17 A. Yeah.

18 Q. I mean, that strikes me as the most efficient
19 way to go about it. I think this is stuff within the
20 scope of the notice. I don't need to take the time to
21 keep going through it now, if Ms. Chimene may knows
22 about it, which is fine.

23 So if we have other specific questions, if I
24 can have you answer those for us about composition of
25 the board, that kind of thing, that would be helpful.

1 A. Okay. It would be in some board notes, thank
2 you.

3 MR. HILTON: Is that all right, Mimi?

4 MS. MARZIANI: Yes, that's fine.

5 MR. HILTON: Okay. Great.

6 **Q. I really don't want to spend much more time on**
7 **this tax stuff, I guess. Is it your understanding these**
8 **are all the tax records from 2018 for the League?**

9 A. These are tax records which were quickly
10 available to me on the 990s. And so they were available
11 to me on the website.

12 **Q. Okay. Do you know if there are other tax**
13 **records that exist that haven't been produced to us?**

14 A. They may be -- I don't know. I just don't
15 know. There may be like an accountant who does a review
16 that might be different than this, but I don't know.
17 There is an accountant, and I know there is a review,
18 but I don't know if this has that or not.

19 **Q. And so I think I know the answer to this**
20 **question, but do you know whether these other documents**
21 **would have information that's not reflected in what has**
22 **been produced to us?**

23 A. I would doubt it. To me, we're very
24 transparent. Everything is up and about. If there's
25 anything more, you know, it would be like treasurer

1 reports or accountant reviews or something. But I don't
2 think it would be any different than this because nobody
3 has ever found any issues, so...

4 Q. Okay. I'm not trying to suggest there would
5 be an issue. I'm just trying to have an understanding
6 of what I have and what I don't. That's all.

7 A. Yeah.

8 Q. All right. I think we can move on. Let's go
9 to page Bates No. 132.

10 A. Okay, all the way to 132?

11 Q. Yes, because I think everything before that is
12 just more tax forms. I have no desire to go through
13 those in detail with you.

14 A. Thank you.

15 Q. If you would really like to, we can do that.
16 I think that's something I'll have to torture myself
17 with on my own time, I suppose.

18 So Bates Nos. 132, what is this?

19 A. Let's see. Just a second.

20 Ah, I did not -- I did not create this
21 document. I was not the president. This is when I
22 became the president after the convention or right at
23 the end of it. So this is -- every two years, the
24 League has a convention where members of the League from
25 all over the state are delegates at the convention, and

1 they all can -- all the delegates can vote.

2 And we have education that we provide to the
3 delegates, and we do different types of education. You
4 can see on page 1, which might be a different page from
5 your Bates.

6 **Q. That's page 1 of this document?**

7 A. Yeah.

8 **Q. That's Bates 133?**

9 A. Page 133, yes, sir.

10 And it just shows what's going on in the
11 convention. It was at Kerrville. It wasn't huge
12 numbers of people there because it was far away in the
13 Hill Country. It wasn't at a big city, but we thought
14 it was important to try to encourage rural stuff, too,
15 rural --

16 **Q. Kerrville is a beautiful area. Where in**
17 **Kerrville was it held?**

18 A. It was in -- I don't know. It says it on the
19 front. Inn of the Hills. Inn of the Hills Conference
20 Center. It was very nice.

21 **Q. I have a friend who lives in Kerrville, so**
22 **I'll ask him about it.**

23 A. The hog farmers were meeting there at the same
24 time, just FYI. We got to learn all about how piglets
25 were born.

1 Q. That sounds like Kerrville, yeah.

2 A. It was very interesting. So it just shows you
3 that people showed up on Friday, mostly around noon, and
4 they left on Sunday whenever we finished, hopefully
5 around noon.

6 Q. I'm sorry, I want to ask a couple things.
7 I'll have you -- again, your explanations are extremely
8 helpful. I appreciate that.

9 It looks like you were vice president at this
10 time; is that correct?

11 A. Yes. I was vice president. I was in charge
12 of advocacy.

13 Q. And you attended this convention, I assume?

14 A. Yes.

15 Q. And you were in charge of advocacy. We've
16 talked about that word a couple of times, and it was in
17 the annual reports.

18 A. Uh-huh.

19 Q. It strikes me that maybe I don't understand
20 exactly what all is encompassed by that. So I
21 understand that advocacy includes the issue positions
22 that we talked about earlier; is that correct?

23 A. Yes.

24 Q. And it involves work at the legislature,
25 including testifying and reading testimony, that kind of

1 **thing; is that right?**

2 A. Right. Voter -- we provide legislators with
3 education. So -- and then lobbying would be like if it
4 was a specific bill that we were providing testimony on.
5 And I think we had like -- we may have started with 25
6 or 26 -- I get confused between the legislative
7 sessions. We had issue chairs who are volunteer members
8 from across the state that may have an interest in a
9 specific area, and they support our position, and we
10 provide them with training on how to follow bills.

11 We have a document on the website called
12 "Guide to Issue Chairs," so we have -- we provide them
13 with training on who they can partner with, how to write
14 testimony. All testimony comes through us, and the
15 president and advocacy chair of the president has to
16 approve it.

17 Then we have a Capitol coordinator who helps
18 gather volunteers to provide the testimony. And we
19 provide the training for all the issue chairs and those
20 people who provide the testimony. We signed on in
21 support and opposition to different bills based on our
22 positions.

23 Leagues at the local level are allowed to also
24 do advocacy, such as, you know, maybe they don't want a
25 dam coming in, or they don't want some big hole built

1 somewhere, and if it's based on one of our positions,
2 they can support it or oppose it.

3 Oftentimes what they do is, instead of
4 specifically being in opposition or support to it,
5 oftentimes they provide an educational -- they provide
6 an educational thing on it. Oftentimes, leagues will
7 work together along with the state on the different
8 bills that are impacting them.

9 It's very interesting. I thought it was
10 interesting.

11 So advocacy is about education, and my
12 understanding as a nurse, now league person, advocacy is
13 education on a subject. And lobbying is specific to a
14 bill.

15 **Q. And everything that you just explained, that**
16 **was -- you were overseeing that when you were vice**
17 **president of advocacy; is that fair?**

18 A. Yes, yes.

19 **Q. Does the litigation that ya'll are involved**
20 **with, does that fall under that umbrella as well?**

21 A. Does it fall under advocacy? You know, I talk
22 -- does it fall under advocacy? I think I've been -- so
23 there's somebody else who is in charge of advocacy right
24 now. I do mostly talk to her if we're going to do some
25 litigation.

1 Q. I'm not asking for anything privileged. I
2 just want to know whether the litigation efforts fall
3 under the advocacy bucket as you guys talk about or --

4 A. Yeah, I don't think they -- I would say maybe
5 fall under the advocacy bucket, but it depends on what
6 is being litigated, I guess.

7 Q. That's fine. That's fair.

8 Turning back to the document now, "Program &
9 Workbook" for the 2018 Biennial Convention.

10 A. Yes.

11 Q. I think for the most part, this is a pretty
12 thorough document, and it speaks for itself. So I'm not
13 going to ask you to go through it page by page like we
14 did for the annual reports.

15 A. Okay.

16 Q. I have a couple of specific questions. I want
17 to make sure I kind of understand what all the sections
18 are. Just letting you know how I would like to proceed
19 with this document is a little bit different from what
20 we did before.

21 A. Okay.

22 Q. The first page I have specific questions about
23 is the Schedule of Events that appears on page 5, which
24 is Bates No. 137.

25 A. Just a second. Okay.

1 Q. I was hoping you can run through the schedule
2 for me and give me an idea of what each of these items
3 is. Some of them, I think, are pretty intuitive, and we
4 don't need to spend a whole bunch of time on -- for
5 example, on registration, seems pretty similar to any
6 other convention. Maybe on some of the other stuff that
7 isn't as obvious, you can tell me a little bit about the
8 content of what might be happening at these times on
9 this schedule.

10 A. So the 10:00 to 12:00 -- so you know what
11 registration is. You probably know what a silent
12 auction is. 10:00 to 12:00 is "Membership & Leadership
13 Development Coaches Training," and that is a program
14 where they have it at national, they have it at the
15 state, where we train experienced league leaders to help
16 guide leagues-at-large and local leagues on how to make
17 improvements, how to do things. So it provides
18 education and mentorship. We used to call them coaches.
19 Now we call them mentors.

20 So that's pretty obvious; right? Do you have
21 questions about that?

22 Q. No, that's fine. I'm happy for you to kind of
23 go down the list exactly, and if I have follow-up
24 questions, I'll let you know.

25 A. Okay. The "Volunteer Training" is for the

1 people, the local league members who volunteered to do
2 something at the convention.

3 "Lunch on Your Own."

4 "Complying with Texas Volunteer Deputy
5 Registrar Laws," as you may know, they're very
6 complicated, and we provide training for the League
7 members who wanted training on this, on this subject.
8 So we actually had lawyers from the Texas Civil Rights
9 Project come and provide us with information.

10 **Q. You said there that was something folks wanted**
11 **training on?**

12 A. Oh, yes. Actually, we stuck this in at the
13 last minute because we found that people really wanted
14 more training on this. So we put it in at lunchtime.

15 So go ahead.

16 **Q. Is that typical of how you'll set the agenda**
17 **for these sorts of things is based on feedback from**
18 **members?**

19 A. Yes. Yeah. That's what we hope to do because
20 we want to provide them with something they're
21 interested in. And they were very interested in it. I
22 think it was very good. They asked great questions. It
23 was a full room.

24 **Q. Do you happen to remember who from TCRP it was**
25 **who gave the talk?**

1 A. I think it might have been Beth Stevens.

2 Q. Okay.

3 A. But I could be wrong. It could have been
4 somebody else.

5 Q. Might say later in the document if you can't
6 remember?

7 A. I don't know. That's my memory.

8 "Workshops," and so the workshops are listed
9 someplace else on page 6. We'll see that in a second.
10 Those are other trainings sessions that we offered.

11 "Silent Auction," again, a fun time on Friday
12 night where the local league gets to make money, and
13 they create an event. And then we have these things
14 called caucuses where people, if they -- so our budget
15 is put out, and our program, which is how we create
16 positions, is put out. And then people can go and talk
17 to those specific leaders and ask them questions about
18 it.

19 I never went to the budget one, FYI.

20 Oh, look Ashley Lopez did the lunch program on
21 Saturday. That was fun. She's from NPR, KUT.

22 "Defending Democracy in Texas," so every year
23 in the evening networking. Every year, we have a
24 money-making thing, dinner, and we try to sell tickets,
25 and then we try to make money to help pay for

1 translation of the Voters Guide and all our forms and
2 everything. And we were honored, Randall Buck Wood, who
3 is a wonderful voting rights lawyer, he told us stories.
4 It was a lot of fun.

5 I love this stuff. I don't know why.

6 "Resolution Committee, Caucuses," so more
7 discussion groups, caucuses and stuff. Resolutions is
8 another process for members to create letters that we
9 might send to specific, you know, leaders. It has to be
10 in support of a position, and it has to be appropriate
11 for whatever the time -- whatever is happening at the
12 time.

13 Oh, look. Chris Carson, the LWVUS president
14 was there, and she gave a speech, and Elaine Wiant was
15 the president at the time. She's the one from Dallas.
16 She's back. She's now doing something else.

17 Yay.

18 **Q. Is it common for someone from the national**
19 **league to come to this convention?**

20 A. It is. It is common. It is common. I did
21 not ask -- I normally try to get somebody from LWVUS to
22 come to one of the convention items things that we have.
23 We had some who were on our Zoom meeting, but they
24 didn't get to speak this time. And also -- yeah,
25 anyway, I'm not going to say.

1 You know, we need to keep it short. So yes,
2 she was wonderful.

3 "Claim Silent Auction Items," okay, that's --
4 and then we had a meeting of the Board of Directors, and
5 we decided who was going to go to convention. And then
6 we got to go home. Yay.

7 "Plenary" is the long and boring part. Oh, my
8 God.

9 **Q. Yeah, I was going to ask (overlapping) --**

10 A. I skipped right past that.

11 Plenary, it's a membership organization, so
12 members get to make, you know, use parliamentary
13 procedure, and they can make changes to program and
14 positions and stuff like that. So it's very
15 interesting. It's very democratic, lots of fun.
16 Woo-hoo!

17 I didn't understand it when I first joined. I
18 didn't even know what a plenary was. But now I do.

19 Anyway -- oh, I'm sorry, go ahead.

20 **Q. I'm sorry. There were a couple others that**
21 **we -- that you didn't talk about that I just want to**
22 **make sure I had an understanding of. The first was on**
23 **Thursday, the Board of Directors of meeting.**

24 **What kinds of things would be discussed at**
25 **that meeting?**

1 A. So the board -- the League of Women Voters of
2 Texas board generally meets four times a year. Most of
3 the time, we meet over a weekend, like a Friday
4 afternoon, Saturday, Sunday. But before convention, it
5 really needs to be about convention. It's not a full
6 meeting. We're not having committee meetings and stuff.

7 And so we have a short board meeting to get
8 the work of the board done and to make sure that
9 everybody is ready for convention.

10 **Q. Okay. One of the other ones that you didn't**
11 **go into a whole lot of detail about is "Meeting of the**
12 **Issue Chairs With Advocacy Committee on Saturday**
13 **Morning."**

14 **What would that meeting be about?**

15 A. So I have told you that volunteers from all
16 over Texas support -- volunteer and are trained to
17 support one of our positions. And because many of them
18 are active in the league, they show up to convention,
19 and they have a meeting, an in-person meeting because
20 most of it is not in-person. Most of it is via e-mail
21 or whatever. And they get to meet with the advocacy
22 group and just talk about issues and do a little
23 training and stuff like that. That's my understanding,
24 yeah.

25 **Q. Uh-huh.**

1 A. Was it with me? It was probably with me. It
2 was early. It's very interesting. It's very
3 interesting. Yep. I think it's interesting. I like
4 it.

5 Q. I can tell you're very passionate about all of
6 it. It's great to hear -- it's always great to hear
7 somebody explain something they're passionate about.

8 Do you remember -- I hesitate to ask about the
9 plenary again, but do you remember anything in
10 particular that was discussed during this plenary
11 session?

12 A. This was the oh-so-much-fun plenary where we
13 got -- where we got a -- we got new bylaws because this
14 is where we changed over, I was telling you before, from
15 the 501(c)(4) over to 501(c)(3), and there was, you
16 know, changes in names and bylaws and things. So it
17 was, yeah, long.

18 I think the plenary something is later on that
19 tells you more about what happened at each step of the
20 plenary. But that was, to me, the most -- some of the
21 most important things. There's only -- I think our
22 bylaws require three things to be done at every
23 convention, and that is to get new people on the board
24 in the new group, and to promote the budget or pass the
25 budget, and to pass the program, which is what I was

1 telling you about is where people maybe fine-tune
2 positions or say, "We're going to have a study on voting
3 in elections," or, "We're going to have a study on human
4 trafficking," or something like that.

5 Those are the three things that had to happen.
6 This was a much more in-depth one because we were
7 changing organization stuff, structures.

8 This next one --

9 Q. I'm making a note to myself so I don't lose
10 something. I apologize.

11 A. Okay, go ahead.

12 Q. I think that's all the questions I have for
13 page 5 for the "Schedule of Events."

14 A. M-hm.

15 Q. For the next page, page 6, Bates No. 138 --

16 A. Yes.

17 Q. -- this appears to me to be a short
18 description of some of the events that happened during
19 the convention. Do I have that right?

20 A. This is the education we provided for members
21 to -- or delegates to get more information about how,
22 whatever the subject is. We call them workshops, I
23 think. Says, "Workshops, Caucuses and Discussion
24 Groups."

25 Q. Can you tell me a little more about the

1 content of these workshops? I guess to start with a
2 particular question, which one of these talk about voter
3 education, voter registration or Get-Out-the-Vote?

4 A. So the voter registration one was the one at
5 lunchtime on Friday; right?

6 Q. That was the deputy voter registrar one?

7 A. VDR, yeah. And then -- and then this one --
8 your specific question, so candidate forms is a type of
9 voter education. So we had discussion on different ways
10 different leagues around Texas could have a candidate
11 form. It's a type of way where voters can meet
12 candidates and ask questions.

13 Some of these are about -- "Social Media," to
14 me, for most of the time is about voter education. It
15 has to do with building up your social media so that you
16 can share the information you need and have it go out so
17 that people know when elections are and what they're
18 about and when the last day to register to vote. It's
19 timeline, and I do have -- I do have --

20 Q. I saw the timeline later in the production, so
21 I'm going to ask you --

22 A. Oh, okay. Good. Good. I didn't know. I
23 forgot that one.

24 Then the 501(c)(3), that's what we were
25 talking about.

1 **Q. Yep.**

2 A. So, thankfully, Chris Carson has a husband who
3 helped with that stuff.

4 "Fundraising," "Navigating League Websites,"
5 so that is -- that was actually taught about the
6 interns, and it was all about how to get around on
7 national and state websites in order to find what you're
8 looking for. Then we were having a lot of stuff on
9 bylaws because that's what this meeting really focused
10 on.

11 The "VOTE411 Network!," I've already talked
12 about how VOTE411 is the online voter education, the
13 national website, VOTE411.org where you could compare
14 candidates online, register to vote, get a vote by mail,
15 all that stuff there. Yay!

16 "Principles of Parliamentary Procedure," Kirk
17 Overbey is our parliamentarian, and he -- leagues across
18 the state and across the country use parliamentary
19 procedure for their proceedings, so... He's really good
20 at it. He helped me with the online convention.

21 What else did we do?

22 And then we had caucuses on program, which I
23 told you is about positions and studies. And the
24 budget, which I would never, ever attend, along with the
25 501(c)(3) conversion which I was telling you about, the

1 conversion from 501(c)(4) to 501(c)(3), which is
2 thankfully something that all happened before I was
3 president. Because I don't know. I think it's
4 fantastic.

5 So not all of it happened. We're still in the
6 midst because we're trying to get the local league to be
7 transferred over.

8 Is that enough about that?

9 Q. I think it is. You know, my question that
10 started that explanation, which again, I really
11 appreciate, was which of these relate to voter
12 registration, voter education, or Get-Out-the-Vote
13 efforts. And I think you answered that question, unless
14 there's anything else you have to add.

15 A. So VOTE411, the candidate forms, what we had
16 previously, social media. I think that is it. Right?

17 Q. Great. You explained those, so I appreciate
18 that.

19 A. Okay.

20 Q. All right. I'm looking ahead through this
21 document to find where my notes are and my questions
22 are. I think things like "Delegate Instructions,"
23 "Proposed Order of Business," "Rules of Convention,"
24 there's a lot of parliamentary procedure type things in
25 here. I can't imagine too much of that is particularly

1 relevant to, you know, this particular case.

2 A. I hope not.

3 Q. So I'm not going to spend the time to chat
4 about that.

5 A. Okay.

6 Q. I would like to jump ahead to the budget.

7 A. What page is it on?

8 Q. Bates 150.

9 A. Just a second. Looks like 149. Oh,
10 explanation of the budgets.

11 Q. Yeah, I apologize. There's an explanation
12 that begins on Bates 149, and then on Bates 150, there's
13 actual numbers.

14 A. Okay. I think that -- as I was saying how
15 when we changed over to the one organization, now the
16 budget is much easier. So if we were going through the
17 budget for this convention, it would be much easier.
18 But this --

19 Q. Yeah, I'm going to get to that. I'm going to
20 get to the next one because it does seem to be much
21 simpler.

22 THE REPORTER: I'm sorry, Mr. Hilton. We have
23 to be mindful not to step over each other's words
24 because you just cancel each other out.

25 MR. HILTON: Sorry, Kimberlee. Not trying to

1 make your job harder than it already is.

2 THE REPORTER: No, you've been doing great.

3 MR. HILTON: Well, that's a first, so I'll
4 take that.

5 Q. So looking at page 18 of this document, which
6 is Bates 150, there's another entity listed that I don't
7 think we've discussed before, which is Lone Star League
8 of Women Voters.

9 Can you explain what that is to me?

10 A. So you couldn't -- so you may have to talk to
11 somebody else. Would you like me to give it a shot?

12 Q. Yeah, why don't you tell me, you know, what
13 you know, and hopefully we won't have to --

14 A. Don't -- don't say that I am -- I am, you
15 know, a nurse. So my understanding is that they took
16 the League of Women Voters of Texas 501(c)(4) and they
17 changed it over to the -- something like the Action
18 Fund, so they changed the name. And then they had to
19 take the Action Fund and change it back to -- so it was
20 like a transition in order to be able to not call the
21 organization the same thing while it was in transition.

22 But we could read about it some more and find
23 out. But that is -- that is -- it is confusing because
24 the League of Women Voters of Texas Action Fund was not
25 -- is not like something -- I think it's the 501(c)(4).

1 So it turned the 501(c)(4) of the League of Women Voters
2 of Texas into the League of Women Voters of Texas Action
3 Fund as a 501(c)(4), which still exists, just in case
4 something huge comes up and we have to spend money on
5 lobbying.

6 Does that make sense?

7 **Q. I think so. What I hear you saying is that**
8 **there's another related entity or other League of Women**
9 **Voters entity called League of Women Voters Action Fund?**

10 A. Yes, sir, that we -- yeah.

11 **Q. And at one point during some sort of corporate**
12 **transition, that was the Lone Star League of Women**
13 **Voters?**

14 A. Damn, that's right. That's another one. So
15 it all had to do with transition. I probably am not the
16 person to tell you exactly how it happened, but it was
17 very deliberative with lawyers following a specific
18 process.

19 **Q. Do you know if there was a document in what**
20 **was given to us that lays out all these different**
21 **entities and their relationship to each other?**

22 A. I would think it would be this one.

23 **Q. Okay.**

24 A. That's what I would think, but I --

25 MR. HILTON: Mimi, this is another area where

1 maybe the most efficient way would be for us to just
2 move on, and if we have other questions about related
3 entities or whatever, I can just ask you that
4 separately.

5 MS. MARZIANI: Yes, that works.

6 MR. HILTON: Q. Yeah. That is totally, you
7 know, it's fine. I understand that you can't go into
8 more detail right now today. To the extent we have more
9 questions about the various League of Women entities and
10 their relationship to each other, again, I think that
11 was within the scope of what we asked for today, but
12 we're not going to -- we can move on for now, and we can
13 get the information submitted that way.

14 A. Thank you.

15 Q. I guess just one question about something that
16 you said, to the extent you can elaborate, you mentioned
17 that this Action Fund is still there in case something
18 big comes up, and you need to do a whole bunch of
19 expenses. I think that was your testimony or something
20 like that.

21 A. Something to do -- it's the Action Fund, and I
22 believe -- I would really need to look at it and see,
23 but I believe it is still there. We still have small
24 meetings. It's just really there in case we have to do
25 some huge lobbying where we have to spend money, which

1 we normally don't on lobbying.

2 **Q. Can you give an example of what that might be**
3 **or maybe a past example where that has occurred?**

4 A. I can't because I don't know --

5 MS. MARZIANI: Objection. Sorry. Took me a
6 second to get off of mute. I was just going to object
7 to the extent that is calling for speculation.

8 Grace, you can continue.

9 MR. HILTON: Noted. I think she answered, but
10 your objection is there. That's fine. I'm just looking
11 at the document to see where I'm going next.

12 **Q. I guess staying on the same page --**

13 A. Which page is that?

14 **Q. I'm sorry, page 18 of the 2018 convention**
15 **book, Bates No. 150.**

16 A. Okay.

17 **Q. Can you explain to me what each of these line**
18 **items in the budget would represent? And I don't need**
19 **you to give me every single dollar and cent, but I would**
20 **like to have a sense of what's represented here.**

21 A. Can you ask me which ones, just say it out
22 loud because there's a long list?

23 **Q. Yeah, I would like to go down the whole list**
24 **of expenses. Let's do those ones.**

25 A. So now there's three different organizations.

1 MS. MARZIANI: Objection. Vague.

2 Chris, could you specify which organization
3 you want to focus on?

4 MR. HILTON: Well --

5 MS. MARZIANI: There's three corporate
6 entities listed on this document.

7 MR. HILTON: Yeah, I mean, I don't know that I
8 can because I don't think I'm clear on exactly what the
9 differences between these, based on what Ms. Chimene is
10 able to tell me today. But I think my question is
11 related more towards what the categories themselves are
12 representing. So the categories themselves are the same
13 for each of these three entities, and I want to know
14 what kind of expenses are reflected within each of that
15 categories.

16 MS. MARZIANI: Okay. That's fine. I just
17 want to remind all of us that the League of Women Voters
18 of Texas is the entity in this case. And so there is a
19 line item for the League of Women Voters of Texas here.
20 Grace has given testimony that after this point, the
21 League of Women Voters of Texas combined with the League
22 of Women Voters of the Texas Education Fund.

23 So I'm happy for her to continue going through
24 those line items, but I do want to just remind us that
25 that's the corporate entity that is in the case.

1 MR. HILTON: Yeah, I appreciate that. I think
2 that's an important point. You know, part of the --
3 that's part of the reason why I've been asking kind of
4 what is the structure and relationship among these is
5 because of that.

6 Q. So, Ms. Chimene, that kind of gives you an
7 understanding of what the issue is that I'm asking about
8 and why I'm asking for all of this.

9 I guess the way to address that is -- excuse
10 me, I guess the way to address that is, you know, I
11 would like to continue to ask the question the way I've
12 asked it, which is for -- explain what each of these
13 categories is, and the categories seem to be the same
14 for all of these three entities.

15 I understand that you may not be able to
16 answer to the extent it goes beyond the League of Women
17 Voters of Texas. You know, as Mimi explained, that's
18 the relation here. So that makes sense.

19 But my question, again, is on this page 18,
20 Bates 150, for each of the categories of expenses
21 listed, I would like to know what kinds of expenses are
22 included and reflected in each of those categories.

23 A. And the expenses are the lower section; right?

24 Q. Yes.

25 A. "Advocacy and lobbying" would be education at

1 the -- to legislators on any of the issues, and lobbying
2 would be education to legislators on specific bills.
3 And also probably could include lobby days where people
4 gather -- members come together and are trained on how
5 to do advocacy on specific topics, and everybody goes
6 together to the Capitol.

7 "Mission projects," I'm sorry, I'm turned
8 sideways trying to see this.

9 Q. No, that's all right. I wish -- if I were
10 there, I could probably rotate it for you so you
11 wouldn't have to crane your neck, but I don't know what
12 software you're even using, I'm sorry.

13 A. "Mission projects" would be things that we do
14 to support our mission of empowering voters and
15 defending democracy, more probably towards the
16 empowering voters which would be the Voters Guide, the
17 translations, the printing the forms, the -- all of the
18 different voter education that we do and that we provide
19 across the state.

20 "Member services" would probably include
21 things like we do regional training for local leagues.
22 We do -- we create educational pamphlets for local
23 leagues. So that's probably what "member services"
24 means.

25 "Convention," well, this is a convention, see

1 how much they spend on convention.

2 "Online software services" would be things
3 like One-Click Politics and the way we send out news,
4 newsletters, the way we -- anything to do with social
5 media, anything to do with --

6 **Q. What is One-Click Politics?**

7 A. One-Click Politics is where you provide -- you
8 write something up on a bill or on a subject, and you
9 send it out to your members, or you have it on social
10 media, and they could -- they put their name in and
11 their address and the message that they -- that we
12 created, that they can modify it sometimes, can go to
13 their representatives.

14 **Q. Okay, I'm sorry to interrupt. I didn't want**
15 **to lose that with one.**

16 A. Advocacy type tool.

17 "Office expenses," you know office expenses,
18 printing stuff.

19 **Q. Just typical, you know, pens, paper, that kind**
20 **of thing?**

21 A. Yeah. We have -- we do have a condo. I don't
22 know where it would fall in here. We have a condo that
23 is close to the Capitol. It's like got two rooms. So
24 somewhere, it either is in office expenses or one of
25 those other things, right, to pay for that, the HOA fee

1 and stuff.

2 **Q. Would that be "Property expenses"?**

3 A. I don't know. Could be "Property expenses"
4 because that looks a little elevated; doesn't it? So it
5 could be the "Property expenses." "Property expenses"
6 could include that and insurance and HOA and taxes.

7 **Q. What is the condo that you-all keep used for?**

8 A. The -- it is the main state office where
9 the -- we have our two employees and the executive
10 administrator, she works there. The volunteers come by
11 there. Then the person who does the membership is in
12 there also, the other part-time person.

13 **Q. So is it an office or --**

14 A. It is in a condo, but it is an office on the
15 first floor. It's at 1212 Guadalupe, No. 107, I think.
16 And I go work there often. We have meetings, we do
17 videos, to make plans, to do lots of things. It's
18 really -- it's really great.

19 **Q. Does anyone ever stay there overnight?**

20 A. They used to. They did. They used to stay
21 there overnight. There's a little bathroom. But it
22 just doesn't really -- it doesn't work well for that.
23 So people did used to come in from other places. Issue
24 chairs used to come in and spend the night there, but
25 they don't do that anymore. Now it's just used for

1 office stuff, file cabinets.

2 Q. I digressed a little bit. I think we talked
3 about "Office expenses," which is the typical kind of
4 expenses attendant to having an office.

5 The next one would be "Accounting, payroll,
6 information technology & website services."

7 A. Information technology, website services, it's
8 pretty obvious to you, right, what that would be?

9 Q. As long as there's no tricky meaning there I'm
10 not clueing into, I think that's fine. Yeah.

11 A. Better not be tricking me because I don't
12 know.

13 "Development and fundraising," that's where we
14 send out letters. We send out the annual report. And
15 we have something called "Kindful" where people can make
16 donations.

17 "Marketing and social media," that is where we
18 do -- we create graphics. We create videos. We create
19 -- then we put it out on our social media to try to
20 educate voters about different things.

21 "Marketing and social media," right? Does
22 that look okay? I'm not looking at the numbers as much.

23 Marketing -- "Board expenses," that's where we
24 come -- the board members come from across Texas, and
25 they travel to Austin, and they stay in the Drury Inn,

1 and we have our meetings. And then once every other
2 year, we go to convention.

3 The most -- many times, if you look up at the
4 top, the in-kind donations, most of the board members
5 donate their travel, and oftentimes will donate hotel
6 stay instead of making the board pay for that.

7 **Q. Gotcha.**

8 A. Yeah. "Property expenses," we went over that.
9 Rent, rent. Yeah.

10 **Q. It looks like --**

11 A. This is going to be much easier on the next
12 workbook, I'm just saying.

13 **Q. No, I understand. It looks like on this one**
14 **rent is being paid from the League of Women Voters of**
15 **Texas to the League of Women Voters of Texas Education**
16 **Fund. Is that a correct reading of this?**

17 A. I don't know. It probably is, but I just
18 don't know.

19 **Q. Do you know what would be rented?**

20 A. The office space.

21 **Q. The last one, "Salaries, payroll taxes,**
22 **benefits," seems pretty self-explanatory.**

23 A. Okay.

24 **Q. Which of these line items relate to the**
25 **League's voter registration, voter education, and**

1 **Get-Out-the-Vote efforts?**

2 A. On the expenses; right?

3 **Q. Yes, please.**

4 A. Mission projects, member services, convention,
5 online services, office expenses. I mean, it's what we
6 do.

7 **Q. So, yeah, I know. I understand your point.**

8 Let me ask it this way then: What direct
9 expenses are there for voter registration efforts that
10 are reflective on this ledger?

11 A. Voter registration efforts are in anything we
12 do. So I don't know when you say "direct" what you
13 mean.

14 **Q. Would you say registration efforts are --**
15 **well, strike that. Let me think about that for a**
16 **moment.**

17 A. Okay.

18 **Q. Well, maybe let's -- maybe let's just put a**
19 **pen in that question, and we can move on. I think it**
20 **maybe will come up in the rest of what I'm doing, or I**
21 **can think of a better way to ask.**

22 A. Might be. Could be.

23 **Q. I guess what I'm trying to get at is, I**
24 **understand that's part of your mission, right, are voter**
25 **registration efforts. And so in that way, any expense**

1 could be said to be related to voter registration. Is
2 that what you're saying?

3 A. Yes, because the website, we use it for voter
4 registration. The social media, we use it for the voter
5 registration. Communications, the administrative people
6 who do the administrating stuff and write the
7 newsletters, everything we do has -- not everything we
8 do, but I mean, it is just a vital part of our
9 organization. So it would be hard for me to say that
10 one thing doesn't have voter registration in it, you
11 know.

12 Q. I think I understand.

13 Is there -- is there a situation where you can
14 look to a voter registration and say the League spent \$1
15 to register that voter? Is that information reflected
16 in this budget, or is that how it happens?

17 A. No, I don't think so. I wouldn't -- I know
18 that we -- one of the goals of moving it over to the
19 single organization was because it was really difficult
20 to divide and tease and tweak and everything to try to
21 figure it out. It's really just almost everything we do
22 is voter -- that's who we are. It's voter registration,
23 voter education.

24 Q. Well, I think that's enough of analyzing the
25 budget spreadsheet. I, by no means, am an expert on

1 this either. I appreciate that you answered my
2 questions on it.

3 A. Thank you.

4 Q. I'm just going to click through here a little
5 bit and see what other questions I have.

6 Skipping ahead to page 23 of this 2018
7 convention document, Bates 155, there's a heading that
8 says "Committee Reports."

9 A. Wait a second. Yes.

10 Q. And what follows appears to me to be headings
11 with the names of various committees. Underneath that
12 are the names of members of that committee.

13 A. Yes.

14 Q. Then there's some text that follows. Do I
15 have all that right?

16 A. Yes, sir, as sort of like a condensed version
17 of what they did.

18 Q. And I guess I just want you to explain a
19 little bit more then -- I don't need you to read these
20 or explain to me what the content of any of these
21 reports are, but maybe you can tell me how these reports
22 are put together and what they're intended to reflect.

23 A. Okay. The -- so the chair of each of the
24 committees puts together the report. So mine was on
25 "Advocacy," which sort of explains all that stuff.

1 And "Communications," it's really
2 communication and technology. Let's see what she did
3 here. And so it's really about how -- the website
4 updates, social media, the voter education stuff we did.
5 She led us in getting text-to-vote reminders. So it's
6 about using technology to support our mission.

7 Does that make sense?

8 **Q. Yeah, for sure.**

9 A. And "Education" -- go ahead.

10 **Q. No, no, continue. Again, I find it's easier**
11 **and more efficient if you just give me the same kind of**
12 **explanation for each one. If you're happy to explain**
13 **it, that would be great. I guess you explained for**
14 **yours for the "Advocacy" committee part. I think you**
15 **touched on the "Communications" one. And you're about**
16 **to explain kind of what we're looking at the "Education"**
17 **committee report.**

18 A. In the league, education may mean something
19 different to people outside the League. So this
20 particular report is about program, which is what we're
21 focused on that particular year or also if we're going
22 to do a study.

23 So this program she's talking about is the
24 Get-Out-the-Vote program, which is also continued on the
25 website under Get-Out-the-Vote, because that's what we

1 do. Hold on. Let me look down here.

2 We did a county website survey to see what
3 counties provided -- there's 254 counties and what they
4 provided on the website and whether voters can find it
5 or not. It was fascinating, made huge improvements, and
6 the counties really appreciated it. One of the things
7 we were looking for is voter registration, whether they
8 offered it on their county website, information.

9 Then voter services -- so that was education.
10 Voter services is a part of education, but voter
11 services is about the Voters Guide, VOTE411, the numbers
12 of things we got out there.

13 And then it gets down to boring "Fiscal
14 Management and Administration," which is kind of what
15 you think it is. It's about how to run and how to pay
16 for the office, how to pay people's salaries, those kind
17 of things. I have to go to those meetings now. It's
18 very boring.

19 "Services to Local Leagues" is about how we --
20 they put on the workshops. They put on regional
21 trainings. They provide -- they train the mentors.
22 They do things for the leagues and the leagues-at-large.

23 Does that make sense?

24 **Q. Yes.**

25 **A.** Just a quick synopsis. "Development" is about

1 making money, which is really important. This is that
2 Get-Out-the-Vote action program which I was telling you
3 about, which we found the best practices for how to get
4 people registered to vote, best practices to
5 Get-Out-the-Vote, and a lot of training things that we
6 offer. And we made it so it's not just for leagues, but
7 any organization could go to our website. It's all open
8 and available for them to use. It's based on research.

9 Elizabeth Erkel put it together. She is from
10 Plano League. She's got her PhD in nursing, and she
11 likes to write a lot. So this is her -- this was her
12 report on that and all the stuff she created and
13 continues to create for the different leagues and
14 organizations to use.

15 Okay, I'm sorry. Now, we're finished with
16 that page.

17 Uh-oh. Chris, you're kind of stuck.

18 THE REPORTER: I wonder if he's using WiFi
19 instead of a direct connection.

20 MS. MARZIANI: Oh, it does look like he got
21 stuck.

22 THE REPORTER: Oh, he just went off. I'm
23 going off the record for just --

24 MS. MARZIANI: Okay, thank you.

25 (Recess taken: 1:53 p.m. - 2:00 p.m.)

1 MR. HILTON: Back on the record.

2 Q. So I think we were there talking about the
3 "Services to Local Leagues" committee. Do I have that
4 right?

5 MS. MARZIANI: Objection. Mischaracterizes
6 the witness.

7 MR. HILTON: Q. I'm sorry, I'm trying to
8 figure out which portion of this 2018 convention
9 document you were talking about, Ms. Chimene.

10 A. So we were going through the reports.

11 Q. Yeah.

12 A. And I went through -- I'll just go through the
13 name of them, and you tell me which one you didn't hear.

14 "Development," did you hear "Development"?

15 Q. I did.

16 A. Okay. Just a second. "Get-Out-the-Vote
17 Action Program"?

18 Q. Yes. Was that the one we were talking about
19 before I cut off?

20 A. I don't know. I don't know when you cut off
21 because I wasn't -- I was looking at this document.
22 Then I noticed --

23 Q. I understand. I understand.

24 Okay. Well, let's pick up here. I do have a
25 specific question about this.

1 A. Go ahead.

2 Q. Page 28 of this 2018 convention document,
3 Bates No. 160 --

4 A. Yes.

5 Q. -- has a listing of what's captioned
6 "Get-Out-the-Vote Action Program Activities & Outcomes."

7 Did I read that correctly?

8 A. Get-Out-the -- "GOTV Action Program Activities
9 & Outcome, 2016 to 2018."

10 Q. Right. That's the table I want to ask you
11 about. Does that table list all of the activities and
12 their outcomes that the League undertook for
13 Get-Out-the-Vote-Action Program?

14 A. Through that timeframe -- let me see. I've
15 got to turn my computer to the side. Just a second.

16 I don't know if it's all -- looks like a
17 really good document, has what we were doing at that
18 time.

19 Q. What other Get-Out-the-Vote activities does
20 the League engage in that aren't reflected in that
21 table?

22 A. No, because now -- I think all of the
23 presentations handouts is what I'm looking at that is
24 missing. The text-to-vote seems to be missing. I can't
25 see -- traditional media, social media is there.

1 So the individualized PowerPoint presentation
2 and the individualized -- oh, little handouts and stuff
3 that we created for each community that has a league
4 seems to be -- it may be something else, but that's what
5 I see that may not be there.

6 **Q. So the particular PowerPoints or pamphlets or**
7 **whatever that were developed are not listed? Is that**
8 **what you're saying?**

9 A. Yeah, pamphlets and that -- and the whole --
10 yeah.

11 **Q. Anything else that you can think of that**
12 **you're not seeing on this list?**

13 A. YouTubes, that might be included under "Social
14 media." It depends on how you wanted to do that,
15 knowing this is for through 2018, now it's 2020. There
16 may be some updates.

17 **Q. Sure. And we'll look at the 2020 convention**
18 **workbook. It's still a draft; is that right?**

19 A. No, no. It may say draft on it, but it was
20 used.

21 **Q. Oh, oh, of course, of course. We'll look at**
22 **that. All right. Bear with me just one moment while I**
23 **have a look at this document and see if there's anything**
24 **else that I need to ask you about this 2018 convention.**

25 A. She's very thorough.

1 Q. Most of the rest of this to me looks to be
2 bylaws and other things like that, and there's a "League
3 Lingo" page at the end, which I like. I don't think I
4 have any questions, but I like that. I'm sure that's
5 helpful for a lot of newbies.

6 A. Make it easier now.

7 Q. I do have one question, actually, about the
8 "League Lingo" sheet. This is page 49 of this document,
9 Bates No. 181.

10 A. Just a second. Okay.

11 Q. It just caught my eye. It's interesting to me
12 "political" is a term ya'll included on this definition
13 sheet. Can you explain to me how that term is used in
14 League lingo and why you would include it on this sheet?

15 A. I took it off the next sheet. I took it off.
16 I took a lot of it off because it just doesn't make any
17 sense to have it on there. It's just -- I guess many
18 people get confused with issues and advocacy versus
19 voter education. But we've already gone through that.

20 Q. All right. I guess we can turn to the 2020
21 convention book. That starts on Bates Nos. 184.

22 A. Okay.

23 Q. Is this the final version that went out to
24 folks?

25 A. Let's look. I don't know. Let me look.

1 Yeah, it probably is because, you know, there's
2 different names. It probably is the one that was online
3 because I probably grabbed it there and sent it to them.

4 Obviously, we had to change the convention
5 because it was an in-person convention.

6 Q. Right, right.

7 A. Which was the plan.

8 Q. Turning to page 6 of this document, Bates 189,
9 again, this is a schedule. We went through the schedule
10 for the 2018 convention.

11 The conventions are every two years; correct?

12 A. Every two years.

13 Q. So I would like to, again, kind of run through
14 the schedule. To the extent these events are the same
15 as the last time, I don't need you to explain them
16 again. If there's anything new on this schedule of
17 events or anything we haven't already talked about, I
18 would appreciate it if you could give me a similar kind
19 of overview of what's going on in each of these
20 sessions.

21 A. Okay. The "Presidents' Dialogue" is where we
22 get together. I wanted to let you know, on the other
23 one, it had the board meeting. I took it off because I
24 didn't feel that was part of convention.

25 Q. Sure.

1 A. It happened on Thursday. The workshops are
2 all different so we should go to the workshop page and
3 see what they were planning on being. "Silent Auction"
4 is the same. "Happy Hour." "Training." "Caucuses,"
5 and remember, it's the same as in budget caucus where
6 they talk about the budget and people come. We did it
7 online instead.

8 "Program" where they talk about changes to
9 positions and to studies that we were planning on doing.
10 That's "Program." "Resolutions" is something where we
11 write letters to -- we say we're going to write a letter
12 to so-and-so about such-and-such. It has to be a timely
13 topic in support of our position and going to one of our
14 state leaders. We didn't have that this time because we
15 weren't doing that online.

16 Saturday, the workshops again. We were doing
17 lots of workshops. It was going to be a great
18 educational time.

19 **Q. Did any of the workshops get to go via Zoom or**
20 **whatever?**

21 A. No. We're going to -- what we're going to try
22 to do is have them -- now they've had a practice Zoom
23 meeting, now we're going to try to do the workshops Zoom
24 once a month throughout the year or so. It will still
25 be fun. The first one is going to be about how to do a

1 Zoom.

2 **Q. That's a good place to start.**

3 A. Let's see. "League Awards & Speakers," we
4 were having a lady come and talk about youth advocacy in
5 the South, which sounded real cool. She had written a
6 book about it. Then the "Plenary," which is that long,
7 boring thing where we get the parliamentary done.

8 Then we have happy hour, yay. Then we have
9 the dinner where we make money, we try to make money.
10 We were having like five different historians come and
11 talk about suffrage, a hundred years of voting rights,
12 and suffrage and stuff. It was going to be so great.

13 **Q. That sounds like it would have been really**
14 **interesting. I'm sorry to make you go down the list of**
15 **stuff that you couldn't do.**

16 A. Then the next day, we do plenary again, more
17 boring. And then we have lunch where the new and old
18 board meet, talk to each other, give each other pep
19 talks. That's it.

20 Do you have any questions about any of that?
21 Did I skip something important?

22 **Q. No, I think that's fine. I'll just note on**
23 **Sunday, it says 2018. Looks like that was just a typo.**

24 A. Thanks a lot.

25 **Q. I'm sorry. I'm sorry. It's part of being a**

1 lawyer. You just can't help but speak up when you
2 notice a typo.

3 But the reason I bring it up is maybe if you
4 can just confirm this is the final version and not some
5 kind of draft where you may have gotten this typo. I
6 just appreciate that confirmation. That doesn't need to
7 be now, if that's okay with Mimi.

8 A. -- what I would have to do is get off this
9 page, go to my website and look at the workbook.

10 Q. Yeah, I don't want to ask you to do that now.
11 If that's something that's okay with your attorneys to
12 handle later, that's fine with me.

13 THE WITNESS: Is that okay, Mimi?

14 MS. MARZIANI: Sure. That's fine.

15 THE WITNESS: Find out what other problems,
16 editing mistakes. Yeah, that's good, thank you.

17 MR. HILTON: Q. Again, I'm sorry. I just
18 couldn't help myself. It wasn't even cautious. It's
19 reflexive. When you see it, you have to clarify.

20 I'm clicking through the rest of this document
21 to see where else I have questions for you.

22 A. Okay.

23 Q. Going ahead to page 19 and 20, I suppose.
24 Bates 202 and 203. This is -- this is the "Budget"
25 section of this convention book; is that right?

1 A. Let me see. Yes.

2 Q. Then on page 20, that's Bates 203, we don't
3 see -- we don't see any different listing for different
4 entities on page 20, which is Bates 203. There is some
5 explanation of some different entities on page 19, which
6 is Bates 202, but they're not -- their budgets aren't
7 broken out separately.

8 Am I interpreting these two pages correctly?

9 A. Right. The whole point of the 2018 convention
10 and voting was to transfer over -- to go through the
11 process we needed to go through in order to become, to
12 simplify and become one organization instead of two
13 separate organizations.

14 Q. And then on page 20, which is Bates 203, we
15 have -- looks to be the same, but it's similar listing
16 of categories of expenses, some line items.

17 A. Yep.

18 Q. I would like to ask you to go through these
19 again and tell me which types of expenses are reflected
20 in each category. But to the extent that it's the same
21 as one we already talked about, obviously I don't need
22 that today.

23 A. Okay. All right. "Advocacy/Lobbying/Lobby
24 Days," Lobby Days is an event at the beginning of the
25 legislative session. And advocacy is educating

1 legislators, and lobbying is about specific bills.

2 **Q. Yeah. I think you explained all of those, so**
3 **I appreciate that.**

4 A. The "Grant Projects" are probably LWVUS apply
5 for grants, and they provide us with money, and so we
6 get some money from them.

7 "Voters Guide," no, this is about expenses.
8 We spend the money on whatever the grant is. The
9 "Voters Guide," you know what that is. We talked about
10 that. "VOTE411" is the online version of the Voters
11 Guide.

12 "Member Services" is that service to local
13 leagues where we do regional training, and we do
14 workshops, and we do convention training, and now we're
15 going to do webinar training for all of the local
16 leagues and their members.

17 "Regional" means when we did it in person, we
18 would go to the individual parts of Texas so that
19 leagues could all come together. We wouldn't go to
20 El Paso, Amarillo and Lubbock; we would go to one place,
21 and then they would come there.

22 **Q. Understood.**

23 A. "Convention," we're going over that. You know
24 what convention is now.

25 "Online Software Services" --

1 **Q. I think you went through those in pretty good**
2 **detail before. I think "Office Expenses," "Accounting**
3 **Payroll, IT and Web Services," unless those changed, I**
4 **think I have an understanding of all those.**

5 A. I tried to get the treasurer to help me out by
6 putting these into these same categories as she did last
7 time.

8 **Q. Got it.**

9 A. Yeah. "Development/Fundraising," "Board
10 Expenses," I told you before. Most of the time, the
11 board gives money back.

12 **Q. Right.**

13 A. "Property Expenses," because it's a condo,
14 HOA. "Salaries, Payroll Taxes," and that's it.

15 Does that make sense?

16 **Q. It does. There's no line item for rent, which**
17 **I think you warned me about; right?**

18 A. Rent, yes, because remember, that was when we
19 had those different organizations, and one organization
20 was paying the other organization to rent as a way to
21 pay for the HOA fee.

22 **Q. And then I want to get -- we had that**
23 **discussion about, you know, expenses for voter**
24 **registration, voter education, Get-Out-the-Vote efforts,**
25 **and whether any of this reflects direct expenses as in**

1 costing a dollar to register those five voters.

2 So my understanding of your answer was that a
3 direct expense like that isn't reflected on this budget;
4 is that correct?

5 MS. MARZIANI: Objection. Asked and answered.

6 MR. HILTON: Q. I'm sorry, you can answer.

7 A. Okay. So my understanding is that except for
8 advocacy, lobbying and lobby days, we talk about and do
9 things that have to do with voter registration in each
10 of these activities: the grant projects; voter
11 guidebook; 411 obviously, right; regional training;
12 convention, because you've seen the workshops; online
13 software services, yes, because that's a website and
14 stuff; office expenses because that's where those people
15 help us with that because it's our main mission;
16 development; web services; board expenses; property
17 expenses.

18 Yeah, I just think it's all built in. There
19 is not something that says it cost us a certain amount.
20 It is just -- it is who we are across Texas. Everybody
21 is involved in this. We talk about it, and do it all
22 the time.

23 Q. That makes sense to me. I think that's
24 consistent with last year's budget. I'm not seeing any
25 differences between the two. I'm not hearing you

1 describe any differences between the two. Unless I'm
2 missing something, I think that's all I had on the
3 budget.

4 We don't need to go through the committee
5 meeting reports again because you gave me a good
6 understanding of what it is I'm looking at there. I can
7 just read those. But right after this budget section,
8 there's a section that talks about programs and proposed
9 programs.

10 A. Right.

11 Q. It begins on page 22 of this document, which
12 is Bates 205, and runs for a couple of pages. Can
13 you -- I don't need you to go through each one, but I'm
14 hoping you can just explain to me what is reflected in
15 this section.

16 A. What's really cool is that the League -- this
17 shows the League is a grassroots organization where the
18 program process -- and "program" for us means something
19 to do with creating the positions and deciding what
20 we're going to focus on for stuff. It starts in like
21 maybe October, and local leagues and members turn things
22 in, making suggestions for updates or studies. And
23 that's what program is.

24 We turn them in, and we review them. It goes
25 through a process, and we recommend or don't recommend

1 them. So this is what took six hours at convention. So
2 we have a huge document that has all of our positions.
3 Those league people chose these specific ones to make
4 little updates on and also to do a couple of studies.

5 So fascinating.

6 Q. I won't make you relive the details of the
7 six-hour Zoom conference nightmare.

8 A. I loved them.

9 Q. I'm just clicking through again. I think that
10 answers all the questions I had about the "Program," the
11 "Committee" section, "Committee Reports," "Bylaws."

12 A. Yeah. We had to make one change to the bylaws
13 during our online convention to be able to have a
14 one-day webinar. It was a lot of fun too.

15 Q. As much as I think any lawyer loves
16 parliamentary procedure, I think we'll move on. All
17 right. So the next document I'm seeing in this
18 collection that was produced to us is the State Board
19 Handbook.

20 A. Yes.

21 Q. A Manual for League of Women Voter of Texas
22 Board of Directors. That starts at Bates No. 236.

23 A. Okay. All right. Yes.

24 Q. Can you just tell me generally what this
25 document is, what the purpose of it is, who would use

1 **this document?**

2 A. Yeah. It is a long document.

3 **Q. And I don't think I have many particular**
4 **questions about it, but I do want to understand what I'm**
5 **looking at when I go back and read it in more detail.**

6 A. So the Board of Directors, we get new voted on
7 at convention. They come on. Then sometimes they come
8 on -- I find somebody who is interested, and I can use
9 our bylaws to vote them in. This is instructions for
10 those board members who come from all across Texas with
11 a variety of backgrounds on what the League is, how the
12 board works, and the different committees. So I can try
13 to find out which one they would fit into most so they
14 can help get the work of the League done.

15 And so this is just -- it's not really
16 official. There is one on the website that is older,
17 but this is the one I'm creating and working on for the
18 next board. Some of it has been updated. It has lots
19 of -- we're just trying to make it as useful and more
20 like a tool. It's not like a law book. It's more like
21 a tool book. Just to help -- help people understand
22 what their role might be. It is not a rule book. It's
23 a helpful book.

24 Does that make sense?

25 **Q. It does. I'm looking through it as you're**

1 explaining it to me. I'm not seeing that I have any
2 questions. I see it has a lot of guidance for board
3 members and I guess for other League of Women Voters of
4 Texas members about how to conduct league business and
5 what league business is all about.

6 Is that a fair characterization?

7 A. This particular book is for league board --
8 state board members.

9 Q. Got it.

10 A. It's available for anybody to look at. But it
11 is for state board members. Unless somebody is really
12 boring, they probably will not open this up. There's
13 plenty of other things for them to open up.

14 Q. Right. Got it. And it looks like it explains
15 the roles, responsibilities, duties of each board member
16 or each position -- each board level position within the
17 League; is that right?

18 A. It is right. It is a guidebook, though. It
19 is not a law. It's not like a policy book. It is a
20 guidebook.

21 Q. All right. I don't think I need to take any
22 more of your time on that. It looks very detailed and
23 very thorough, and I think it pretty much is going to
24 answer whatever questions I might have. So I think
25 that's fine.

1 **So the next one that I see here is Bates**
2 **No. 280, "Best Practices for Voter Registration."**

3 A. All righty. Just a second. All right. Just
4 a second. So this is -- okay, good. Excellent.

5 **Q. This looks to be a 19-page or I guess -- is**
6 **this a PowerPoint presentation?**

7 A. I think it's a PowerPoint presentation.

8 **Q. It looks to be a 19-slide PowerPoint that runs**
9 **through Bates No. 298. So we're starting at the**
10 **beginning. I guess can you explain to me what this**
11 **PowerPoint presentation would be used for, who would**
12 **give the presentation and to whom?**

13 A. So this was created by Elizabeth Erkel who is
14 a former member of the board who helps with the
15 Get-Out-the-Vote pages and information. This is
16 available for local leagues to download and use. It is
17 on our website on the Get-Out-the-Vote pages.

18 What she did was gather best practices and
19 information that had to do with Texas about voter
20 registration and so that local leagues can use this as
21 the beginning of a talk that they might have if they
22 chose to at the local level, local league.

23 **Q. Have you personally ever given this**
24 **presentation or this talk?**

25 A. No, I have not, but I have looked through

1 them.

2 Q. Have you ever attended a version of this talk
3 or this presentation?

4 A. No, I haven't.

5 Q. Are you able to explain to me kind of the
6 content of the presentation if we were to go through the
7 slides?

8 A. Yes, I think so.

9 Q. Okay. Well, let's try to do that. I don't
10 think we need to do it in a huge amount of detail, but
11 to the extent it's a PowerPoint and gives bullet points
12 as to the full explanation of each topic, I might ask
13 you to explain a little bit about what information is
14 going to be communicated in this presentation.

15 I think we can skip ahead to page 3, which is
16 Bates 282. That seems to be the first page with any
17 content on it. It is just the preface. You've already
18 given me kind of an idea what this presentation is for.

19 Do you have anything to add to that, or is
20 there anything else that would be explained in
21 connection with the slide?

22 A. It's sending you -- it's sending the people
23 who are watching it to other topics, other pamphlets
24 that probably are provided as a handout. Timeline,
25 another probably a topic for a handout.

1 **Q. Okay. Let's just go ahead to the next page.**
2 **It's slide 4, Bates 283. No. 1, "Be visible," there's a**
3 **couple of bullet points, a couple of graphics. So you**
4 **can explain what this means, and I'll leave it to you to**
5 **explain it to me.**

6 A. So this would probably be somebody talking to
7 a local -- local league members who are interested or
8 even other folks who are interested in doing VDRs who
9 are interested in doing voter registration. And this is
10 just some great ideas for people to have if they are
11 tabling where they would set up some place and try to
12 encourage, and voters would walk up to them, and
13 probably they would talk about the different events they
14 could have, like high school voter registration events,
15 college campuses, libraries, rock-and-roll events, you
16 know, whatever they do. And then it also has different
17 things that people may want to have at their table.

18 **Q. And I think you used the -- let me ask this:**
19 **So at this table, is the idea to attract potential**
20 **voters? Is this to attract potential volunteers? Both?**
21 **Or who is trying to be attracted to these tables?**

22 A. They would probably have something for
23 volunteers, but the point of this table would be to have
24 a big sign that say "Register to Vote," "Be a Texas
25 Voter," and provide information to review.

1 If those people were coming up to the table
2 were registered to vote, if they needed to register to
3 vote, if they had a change in their status, like they
4 moved from one place to another, if they had a change in
5 their name, if they moved from one county to another,
6 and probably they have a way for people to sign up to
7 get texting reminders.

8 **Q. Why is it important to be visible at a table**
9 **like this?**

10 A. Because otherwise people won't know why you're
11 there. So we do put up a lot of things that say we're
12 the League of Women Voters, and also allows us to get
13 into places because we -- they know that we're
14 nonpartisan, and we can be places that people don't have
15 to worry that they're going to be hassled about who
16 they're voting for, but more about the process of voting
17 itself.

18 **Q. Is the goal to attract as many people as**
19 **possible to come over to the table?**

20 A. Well, the goal would be to attract the people
21 who need to have this service to come to the table
22 because we don't give anybody -- I mean, a sticker is
23 fine. But we don't give out prizes or anything. But we
24 do encourage -- we put enough signs up so that people
25 will walk over to the table.

1 If they go, "Oh, I just moved," "Oh, I just
2 changed my name," or, "I remember there's an election
3 coming up, and I've got to check on this," or, "I have a
4 question about something," so they come up. It's not to
5 get people who don't need that information to come up.

6 Does that make sense? We're not giving
7 anything away to get everybody to come up to the table.
8 We just --

9 **Q. Yeah. That does make sense. I appreciate**
10 **that clarification.**

11 **Would a league member who is staffing one of**
12 **these tables, would they talk to anyone who approaches?**

13 **A. They will. And I want you to remember that**
14 **the annual reports that we went through earlier had**
15 **pictures. And in each one of those, I think -- I know**
16 **for sure one of them I said, "Oh, that's the League of**
17 **Women Voters of Fort Bend County," and they were five**
18 **different people sitting behind the table, some of them**
19 **standing. That is an example of the voter registration**
20 **table they were having.**

21 **And then I forgot what the question was.**

22 **Q. No, that's fine. That's helpful for -- I**
23 **appreciate you pointing that out so I can see an example**
24 **of it.**

25 **If someone walks up to the table and says,**

1 "I've registered to vote, and I intend to vote," will
2 you turn them away, or will you still engage with anyone
3 -- will a league member still engage with anyone who
4 wants to come up and ask a question?

5 A. We would engage with them on that question,
6 and we would engage -- we would say something like, "Oh,
7 yeah, how would you" -- probably, something like I would
8 want to go and look through this, make sure I phrased it
9 right. "Tell me what your plan is to vote," if they
10 think they're already registered. "Or did you get the
11 new voter registration card, postcard in the mail? What
12 color is it?" Right? Something to show us that they're
13 actually registered, that they don't think they're
14 registered and aren't registered, so that we can show
15 that -- and sometimes we might say, "Would you like us
16 to verify that you're registered?" And so then we would
17 go either to the county website or to the VoteTexas.gov
18 website and look up to see whether they're on the voter
19 registration roles and just check it, if they have
20 enough time.

21 Q. If someone approaches one of these tables and
22 asks a league member or a league volunteer something to
23 do about their voter registration status, or whatever,
24 is there ever a circumstance where a league member or a
25 league volunteer would turn away that person and say,

1 "No, you're not the kind of person we're here to chat
2 about today, please leave"?

3 A. I know you've been listening to me all day
4 long.

5 Q. I think I know what the answer is, but
6 sometimes I just need to ask anyway.

7 A. No, we don't turn away anybody.

8 Now, if the volunteer deputy -- if that person
9 is from out of state, then we would still talk to them.

10 Even if the person is -- we talk to everybody.

11 Obviously, league people love to talk. We love to
12 support democracy, and if they were already registered,
13 we would talk to them about the next steps. "Oh, so
14 what's your plan to vote? Have some information."

15 We provide them with information on next steps
16 and how to make a plan to vote, like the next elections.
17 We have little cards they can put in their wallet or
18 their purse that has the information they need to go and
19 make sure they participate in the election. We might
20 sign them up for the text to register, text -- text
21 reminders.

22 Q. It seems to me that -- tell me if I'm wrong --
23 that anyone who wants to approach one of these tables
24 and talk about something related to voting, there's some
25 kind of productive conversation that you can have?

1 **A.** Yes, I think so, yes.

2 **Q.** Okay. Looking back to our PowerPoint
3 presentation here and figuring out -- oh, we should have
4 gone to the next slide. There's more pictures there of
5 these tables, so that's helpful.

6 A. There you go. I'm trying to look and see
7 where they're from. I would have to look closer. More
8 than likely, because it was created by Elizabeth Erkel,
9 look, she has like a North Carolina t-shirt on. "Vote
10 ya'll," but it says, "Vote ya'll."

11 **Q.** I think we talked about all the things that
12 are reflected here. I mean, it says, "Don't just stand
13 there. Move around. Be friendly. Be assertive. Be
14 enjoyable." Why are those things important?

15 A. Because we want to be welcoming. This is
16 Texas, and we want to welcome everybody into the voting
17 process here in Texas. And that's what we love doing.

18 And so we don't -- if you sit there behind the
19 table and not be inviting, then people aren't going to
20 come up to you. So we're smiling. No matter what
21 process they're in, that we would provide them with
22 assistance on encouraging them to vote.

23 "Piece of cake," cute. I'm sorry.

24 **Q.** Let's go to the next slide, I suppose, slide
25 **No. 6, Bates 285, slide 2, "Talk about voting."**

1 A. Yes.

2 **Q. Can you explain to me this slide?**

3 A. That picture right there is a picture of
4 Elizabeth Erkel with her two grandchildren. She's
5 dressed up in her suffrage outfit. I'm just letting you
6 know that. She's the one that wrote all these
7 presentations.

8 **Q. Gotcha.**

9 A. She did the research. Everybody has a
10 different reason for voting, and you do not -- as a way
11 of being nonpartisan, we do not ever say, "I'm voting
12 because of immigration," or something. We just -- we
13 don't do that because we don't want to ever push one
14 side or another.

15 And so having the voters explain their own
16 reason for voting gives us an opportunity to encourage
17 them in whatever part of the process they're in. "Share
18 a personal story" helps people understand the process of
19 voting. If you share a personal story about voting
20 early or voting in person or voting by mail, it just
21 makes it more -- feel better and more like they're
22 welcomed into the voting process.

23 **Q. One of the questions on here -- I guess, this**
24 **is a question that someone who is staffing one of these**
25 **tables could ask is, "How important is it for you to be**

1 a voter in the upcoming election?" Did I get that
2 right?

3 A. Yes, that is -- that is what it says on the
4 slide. You would ask them, "How important is it for you
5 to be a voter?" "To be a voter." And "to be a voter"
6 is a very inviting phrase.

7 So Texas has got a very low voter registration
8 rate. It's gotten lots better, but a low participation
9 rate. We want to encourage everybody. We have
10 researched ways of saying things that try to make
11 everybody feel welcome, they're being a part of the
12 process.

13 Q. You anticipated my question perfectly. I was
14 going to ask you why you would the ask question like
15 that, and exactly what I got.

16 Let's look at the next slide, slide No. 7.
17 This talks a little bit about things not to talk about
18 and reasons why that might be the case. I was hoping
19 you could just explain that in a little more detail for
20 me.

21 A. So during the election right up to the
22 election, we -- because research shows that if you talk
23 negatively about voting and you talk about low voter
24 turnout, "Nobody likes to vote," nobody wants to go to
25 that party; right? So we try to talk positively and be

1 encouraging about voting; right?

2 Look, look, that's exactly what it says.

3 And yeah. So it is a problem in Texas, and
4 maybe in other places -- I've only lived in Texas -- is
5 that if people are negative, then it is much more -- if
6 you only talk about difficulties people are having or
7 about how nobody is participating or nobody does
8 anything, if it's very negative, then people aren't
9 going to participate. We try to encourage everybody to
10 participate. So the run-up towards an election, we
11 really want to stay positive.

12 Does that make sense? It does to me.

13 **Q. It does. No, that makes perfect sense.**

14 **I guess the next slide says, "Be nonpartisan."**
15 **We've talked quite a bit about that today, I think. You**
16 **explained it in some detail, which I appreciate.**

17 **Is there anything else from this slide, which**
18 **is slide 8, or 287, or the next slide, slide 9, which is**
19 **Bates 288, is there any other information about those**
20 **two about being nonpartisan we haven't already talked**
21 **about today?**

22 **A. No. If you are dressed -- if you are at a**
23 **league table, if you are at a league event, if you are**
24 **representing the league in any way, you have league**
25 **outfit on or whatever, then we encourage those league**

1 members to stay nonpartisan, not put buttons, not
2 encourage one candidate over another, one party over
3 another. So that is it. I think we got it.

4 It looks like no ducks, donkeys or elephants.
5 Isn't that interesting?

6 **Q. Yeah, I wasn't sure about the duck. Is that a**
7 **joke, this injured duck, or a party I'm not familiar**
8 **with?**

9 A. I think it's a joke. Always at the beginning
10 of each of our meetings and every time we get together,
11 we always go over what it means to be nonpartisan. It
12 does not mean you're not political and you're not active
13 and you don't participate in our government, but that
14 when you're representing the League, that you stay
15 nonpartisan.

16 **Q. Got it. Got it.**

17 **Next section starts on slide 10, which is**
18 **Bates No. 289.**

19 A. Oh.

20 **Q. Down to slide No. 11, says, "Maintain**
21 **privacy." Can you talk a little bit about this section**
22 **of the presentation?**

23 A. Page 289, "Maintain privacy," let me look at
24 it. "Don't ask applicants to provide you with personal
25 information." We try to -- and this is not always the

1 case, but we try to get people to sign up for the voting
2 reminders by text where the people can sign up
3 themselves into that service and get text reminders on
4 their phone.

5 Otherwise, this is not necessarily a policy,
6 because I know some leagues and some places we do ask
7 people to sign a postcard. Instead of sign up for
8 voting reminders, they can sign a postcard and get
9 reminder about elections.

10 But it also might be a place where a league
11 member who was doing a presentation might talk about not
12 taking pictures of the voter registration cards and
13 reminding them that we will take very good special care
14 of your voter registration card, and tell them what the
15 part of the process is so that they feel comfortable
16 filling out the card and giving it to you, because
17 they're providing you with their personal information.

18 Now, if they wanted to fill out something and
19 get the text reminders or have reminders sent to them
20 because they filled out something else, that's
21 different. But that voter registration card is theirs,
22 and you review it with them, and you check that
23 everything has been done correctly, and then you put
24 your VR number on there, and then you, you know, it goes
25 into a safe place, and there's a certain amount of time

1 they have to get it over to the county voter registrar.

2 So that's -- if I were giving the speech,
3 that's some of the things I would say on that one.

4 **Q. That's great. That's exactly what I'm hoping**
5 **for.**

6 A. The other thing you wouldn't ask in this spot
7 would be you wouldn't -- you may say something sort of
8 sneaky like, "Are you off paper"; right? Or something
9 like that. But you would say it in a way that wouldn't
10 embarrass the person. So it's also giving that kind of
11 privacy where you wouldn't dig into why they are not
12 registering to vote because that may be something they
13 don't want to share with the people around them.

14 I think that also might be part of that topic.
15 Even though it doesn't say it here on the screen, it is
16 probably something that is talked about.

17 **Q. Got it. Got it. And that kind of -- I think**
18 **all of that kind of dovetails pretty well with the next**
19 **section here, "Work with special populations." Looks**
20 **like slides 12, 13 and 14 talk about that. It talks**
21 **about the Address Confidentiality Program, which is a**
22 **great program.**

23 **That refers to the state laws related to**
24 **protecting confidentiality of certain types of voters;**
25 **correct?**

1 A. Correct. We do a special social media
2 campaign for domestic violence and other folks who need
3 to have their voter registration kept, you know, their
4 address and stuff kept private.

5 **Q. I don't know that I really have any questions**
6 **about this part of it. It's seems like this would be a**
7 **point in the presentation where someone can educate**
8 **whoever they're talking to about this program and how to**
9 **work with it. Is that a fair characterization?**

10 A. Yeah. This is to talk about special
11 populations that you may run into as a volunteer deputy
12 registrar. So that would include people who are
13 homeless. This would go over people who are homeless or
14 people who under domestic violence or people who had --
15 who are on paper. So you can say -- off paper, on
16 paper, so you can make sure you can deal with some
17 possible situations that may come up.

18 **Q. The next section beginning on slide 15,**
19 **beginning Bates 294, says, "Educate new voters." And it**
20 **looks to be a flowchart for how a conversation might go.**

21 **Do I have that correct?**

22 A. So this is about new voters, not people who
23 have been voting for a long time. So that's how I would
24 say. This is not about -- this might be about somebody
25 who is a high school person or a college person who's

1 just voting for the first time or somebody who --
2 somebody who moved in from California where they have
3 different rules.

4 So this is educating new voters than people
5 who have been voting in every election. So it talks
6 about the how, what, where, why, when, all that, in
7 order to make sure they have a plan to vote. It's not
8 just about registering, but ensuring that you are
9 registered, verifying that you're registered, checking
10 that you got that voter registration card in the mail.
11 Stuff like that.

12 **Q. Then on the next page, it looks like it has**
13 **some links to some other materials that someone who is**
14 **at one of these tables or is doing some outreach might**
15 **want to have available. Do I have that right?**

16 A. So these are available on the GOTV web pages.
17 They're updated for most elections with these big
18 changes that happen to election dates. I don't think
19 they're updated these new ones yet.

20 But this is an example of what may be handed
21 out to them. I don't know if we still do the "Election
22 Information Texans Can Trust." But, you know, things
23 like that. It's an example of what we may hand to
24 people. It generally is -- if Elizabeth is still doing
25 it, it has -- it's individualized for the folks

1 depending on where they're at so that they could
2 advertise for their specific league, and they could have
3 the website of their specific county if they happen to
4 be in a county. There's a generic one for if you're
5 someplace where people come from different places.

6 **Q. And then the next or the last three slides or**
7 **so, Bates 296, -97 and -98, all look to me at least to**
8 **just be links or references to other resources. First**
9 **one is "Know the law." It contains links, presumably,**
10 **to information about various laws.**

11 **Do I have that right?**

12 A. I would have to look at the tinyurl. I don't
13 know -- "tinyurl" is probably because the URL is too
14 long. So first one looks like a link to the National
15 Voter Registration Act. Perhaps the Motor/Voter Act. I
16 would have to open it up to see.

17 And I bet Texas Voting may be going to
18 TexasVote.gov. I'm just guessing. I would have to go
19 to that URL to see.

20 And then -- oh, look, they have the Texas
21 Volunteer Deputy Registrar Guide from the Texas
22 Secretary of State. To me, they all kind of go
23 together. The National Voter Registration Act and
24 Motor/Voter law, the Texas general law and then how to
25 be -- the Volunteer Deputy Registrar Guide, that's

1 provided by the Secretary of State.

2 Q. Got it. And it seems to me that the intent of
3 this slide would be just to provide these as other
4 resources to folks who want to find out more? Is that
5 how someone would use this slide in a talk?

6 A. Because they are probably -- the League
7 members are probably talking to VDRs. Or the next
8 step -- when you become a VDR, the next step is how to
9 become a really excellent VDR. Then this would probably
10 be the place where they may talk about what our lawsuit
11 is about, which is the DPS issues, because I suppose
12 that's why this says Motor/Voter on it, because that is
13 one of the main issues.

14 So to me, this may be where they would talk
15 about the DPS driver --

16 Q. Got it. Got it. Appreciate that.

17 And the links on this page and the links on
18 the next two pages that have other "Voter Registration
19 Resources," is what it says on 18, and "References" on
20 No. 19, you didn't review any of these links or what
21 they linked to to prepare for this deposition; correct?

22 A. I did not. I do know who Nonprofit VOTES is
23 and what they provide. I really appreciate them. It's
24 a national organization. I know who they are. I go to
25 some of their training things.

1 The LWV-TX resources, that's specifically for
2 educators. That's a special page we have on our
3 website.

4 And then National Voter Registration Day is
5 one of the days that the League is really involved in.
6 Leagues and other groups from all over the nation, that
7 is a huge national voter registration day to get
8 everybody registered to vote. It has different social
9 media tools and other tools we use. It's good.

10 And then the "References," Elizabeth Erkel, as
11 I said before, is a PhD person. So she's big into
12 references. I commend her for that. I do not click on
13 those.

14 **Q. I totally understand that you're familiar with**
15 **a bunch of these generally. But I guess my specific**
16 **question is: You didn't sit down and click on each of**
17 **these links and review these materials to prepare for**
18 **the deposition?**

19 A. No, I did not. No.

20 **Q. And that is a hundred percent fine. I would**
21 **not have expected you to.**

22 A. Okay.

23 **Q. And then the next couple of pages, it looks**
24 **like the presentation ends on slide 19, but then the**
25 **next two pages are maybe a handout that goes with this**

1 presentation.

2 Do I have that correct, or do you know?

3 A. I don't know. It says 3. Why does it say 3?

4 There's a 7. Then there's a --

5 Q. I'm looking at Bates No. 299 and 300.

6 A. 299 is a handout. It looks like a handout
7 that we've created that's just -- that could be used
8 during one of these presentations.

9 Q. That's what it looks like to me, too. So that
10 makes sense.

11 A. And more references, like I said, that's who
12 she is, and it's good.

13 Q. Then after that handout, starting on Bates
14 No. 301 going through Bates No. 318, that looks to me
15 like --

16 A. It's the same thing.

17 Q. -- it's the same thing.

18 Can you please take a minute and look through
19 this? I think this one is only 18 slides. Maybe that's
20 the difference is that one of the slides got cut off.
21 Can you please look through that and tell me if it is
22 the same or if there are any, you know, substantial
23 differences between this one and the one we just --

24 A. Yeah, I'm almost through, just a second.

25 Q. Thank you. I appreciate it.

1 A. (Reviewing document.) It looks the same.
2 What about this? "What to Say: Talking About Voter
3 Registration," I don't remember that one. Was that
4 there?

5 **Q. Which Bates number are you looking at?**

6 A. 319.

7 **Q. Yeah. I think that's the new document or at**
8 **least that's how I'm interpreting it. So the PowerPoint**
9 **slides --**

10 A. Were the same.

11 **Q. -- ending 318, those all look the same to you?**

12 A. Yeah, they do.

13 **Q. Fair enough. So Bates 319, says, "What to**
14 **Say: Talking About Voter Registration," and that looks**
15 **like a two-page document. Again, at the bottom has**
16 **Dr. Erkel's name. Can you explain a little bit about**
17 **what I'm looking at here?**

18 A. So this one is like we were talking earlier
19 about the Get-Out-the-Vote program, about how to stay
20 positive, about how to make sure that they -- to use
21 your own experiences, right there up on the upper
22 right-hand side. And then to try to find out if they
23 need to have their voter registration. "Do you want to
24 register to vote?" "Have you moved recently?"

25 It's a back-and-forth between the VDR. It's

1 an example of some back-and-forth language. Huh, I'm
2 going to change that. Okay.

3 **Q. What would you like to change?**

4 A. I'm not telling you. No, I can tell you if
5 you want.

6 **Q. I am curious actually.**

7 A. The Vote.org. "Would you like to sign up for
8 voting and election reminders?" Why is it sending it to
9 Vote.org instead of our own texting resource? Doesn't
10 make any sense. So probably this may -- I don't know if
11 it's dated or not. But --

12 **Q. Gotcha.**

13 A. Anyway.

14 **Q. All right. I think I understand what I'm**
15 **looking at on this document. I think we talked pretty**
16 **much about the substance of all these types of things in**
17 **connection with the presentation. So --**

18 A. This is also where a person would bring up and
19 it would come up if it was -- how did they register to
20 vote? How is it -- how do you know you're registered to
21 vote? So if there is an issue that they can do it in a
22 nice and pleasant way. Reassuring.

23 **Q. Got it. Then the next page --**

24 THE REPORTER: Uh-oh. Looks like he froze
25 again. I'm going to go off the record, Mimi.

1 MS. MARZIANI: Okay, thank you. Let's take a
2 five-minute break.

3 (Recess taken: 3:05 p.m. to 3:14 p.m.)

4 MR. HILTON: Okay. Great. Again, sorry that
5 my video cut out again. You know, I don't think it was
6 too bad a time for us to cut out because we had been
7 talking about one document. I was pretty much ready to
8 move to another one anyway. I don't think I need you to
9 read anything back or anything.

10 Q. I guess I have one question about one of the
11 last topics we were talking about. One of the topics on
12 this two-page handout, Bates Nos. 319, 320, is someone
13 who thinks they're registered or isn't sure whether
14 they're registered. And you touched on that a little
15 bit.

16 You said some of the follow-up questions would
17 be like: "How did you register?" "How do you know
18 you're registered." That kind of thing. Is that
19 fair -- a fair characterization of what we were just
20 talking about?

21 A. "How did you register?" "How do you know you
22 were registered?" "Did you get a voter registration
23 card in the mail?" Oftentimes, they may think they're
24 registered even though they moved. Or it's just -- lots
25 of things.

1 Q. Right. There's lots of different -- there are
2 a number of different ways that folks could register to
3 vote; correct?

4 A. Yes. These are just examples.

5 Q. Right. I'm not asking for an exhaustive list.

6 A. Yeah.

7 Q. And there are a number of different reasons
8 why someone might be unsure whether they're registered
9 to vote; correct?

10 A. Yes.

11 Q. Do league members or league volunteers or
12 someone who is engaging in these outreach efforts, do
13 they keep track of the particular reason why each person
14 who approaches them is not registered to vote?

15 A. No, not that I know of.

16 Q. And do they keep track of how someone tried to
17 register to vote before they came and talked to a
18 volunteer?

19 A. They don't keep track of it, but they listen
20 for that.

21 Q. I understand. They don't write it down
22 anywhere and keep tabs on numbers or anything like that?

23 A. No.

24 Q. Okay. Turning back to the documents, I think
25 right before I cut out, I was trying to ask you about

1 Bates No. 321. So I was hoping if you would just kind
2 of explain, you know, what this timeline is, what's it a
3 timeline of, where this document came from, just kind of
4 give me a sense of what I'm looking at.

5 A. This is Nonprofits.org; right? Yeah,
6 NonprofitVOTES.org. It's a nonpartisan national
7 organization that encourages nonprofits and -- to
8 register to vote, register their clients to vote and to
9 encourage voter registration.

10 So this is just an example of -- especially
11 for those organizations new to voter registration for
12 the timeline that they would perhaps need to follow
13 based on when an election is happening. This is not a
14 document the League created.

15 Q. And so this is not a document the League
16 created?

17 A. This is not a document the League created, but
18 we do share it on our web page.

19 Q. Got it. Does this reflect a typical timeline
20 for league activities? I mean, I understand ya'll
21 didn't create it and that it's not a detailed
22 description of League-specific activities, but is this
23 the kind of thing that the League engages in?

24 A. The only thing I would say that is different
25 is that this is for an organization it looks like, such

1 as a health clinic, right, would be a nonprofit
2 organization that would use this. And the difference in
3 the League is that our voter registration efforts are
4 year-round with emphasis at certain times of the year.
5 But not necessarily based on this.

6 So this is information probably to give to a
7 partnering organization, maybe a food bank, maybe a
8 daycare center or something that want to be involved
9 with the registering voters, but they haven't set it up
10 yet. Does that make sense?

11 **Q. I see. I think I understand. I think I**
12 **understand. This document is geared towards an**
13 **organization that isn't centered around voter**
14 **registration, voter education, Get-Out-the-Vote?**

15 **A. Right. That would be us. And this would be**
16 **to -- because our Get-Out-the-Vote isn't just our**
17 **organization, but for partnering organizations. And so**
18 **this is a timeline for a partnering organization who may**
19 **be doing something else to put -- to encourage their**
20 **clients to register to vote.**

21 **Q. And as we talked about earlier, the League --**
22 **the core mission is voter registration, voter education,**
23 **Get-Out-the-Vote. So those activities are happening all**
24 **the time; whereas, this timeline would be about ramping**
25 **up to Election Day?**

1 A. Right. This is for -- this is for a
2 healthcare clinic, a food bank, or something else that's
3 ramping up; whereas, we may ramp up before the last day
4 to register to vote, but we register our people to vote
5 all year around.

6 Q. Okay. This timeline isn't going to tell me a
7 whole lot about the League's ramp-up efforts in a
8 lead-up to an election?

9 A. No, it might not. I don't know. Doesn't seem
10 to.

11 Q. There may be some similarities, but that's not
12 what it's directed toward?

13 A. Yeah.

14 Q. Got it. Next page, Bates 322. I'm just not
15 sure what I'm looking at here.

16 A. Over on the left-hand side, it says Emily Eby.
17 Emily Eby is one of our members who moved from Travis
18 County to Harris County. This is her league membership
19 date.

20 Q. I got you. So it's showing she is a member
21 during this time period?

22 A. Yes, sir.

23 Q. Got it. Do you know if she was a member
24 before December 18th, 2018?

25 A. I don't know. But you could find out. I just

1 don't know.

2 Q. And you talked about Emily Eby in one of your
3 declarations. Do you recall that?

4 A. Yes, kind of. I would have to look at it to
5 see exactly what I said.

6 Q. If you don't mind, I'm going to pull it up on
7 the screen share so we can have a look at it and see if
8 I have any questions about it. This is already an
9 exhibit to the deposition. I apologize. I can't
10 remember a number because I was pretty sloppy when we
11 were going through earlier. I apologize to everyone.
12 I'm sure we'll figure it out later.

13 But we're looking at the Supplemental
14 Declaration of Grace Chimene; is that right?

15 A. Yes.

16 Q. And in paragraphs 4 and 5 of the Supplemental
17 Declaration, it mentions Emily Eby; is that correct?

18 A. Yes, it does.

19 Q. And paragraph 3 as well?

20 A. Yes.

21 Q. Then turn to the second page of this
22 declaration, she's again discussed in paragraph 6 and 7?

23 A. M-hm.

24 Q. In paragraph 4, you testified a minute ago
25 Travis County to Harris County in November 2019. Do you

1 know if she intends to move again?

2 A. No, but I figure -- I figure she will.

3 Q. But you don't know specifically her plans on
4 whether she intends to move?

5 A. I do not know specifically her plans.

6 Q. Okay. Got it. And paragraph 5, it says she
7 used the DPS online system in December of 2019 to change
8 her address. Do you know what date in December she used
9 that system?

10 A. I do not know.

11 Q. That's fine. "I don't know" is an acceptable
12 answer, as I'm sure your Counsel has told you.

13 Then in paragraph 7 of this declaration, it
14 says, "Emily Eby remains unregistered to vote in Harris
15 County as of today's date."

16 Did I read that correctly?

17 A. Yes.

18 Q. That date is the date you executed it,
19 January 28th, 2020; is that right?

20 A. Yes.

21 Q. Do you know if Ms. Eby subsequently registered
22 to vote?

23 A. I don't know.

24 Q. That's totally fine for today's purposes. So
25 I think that's all I have on that.

1 Turning back to the League Bates-numbered
2 documents, we had just looked at Emily Eby's membership
3 page, which shows the dates of her membership.

4 So turning now to Bates No. 323, it says,
5 "Administrative Coordinator Job Description"; is that
6 correct?

7 A. Yes.

8 Q. This is the three-quarters employee that we
9 talked about earlier?

10 A. Yes.

11 Q. And does this reflect all of -- what was her
12 name again? I'm sorry, I can't recall.

13 A. The three-quarters person's name is Karen
14 Kelly.

15 Q. And does this accurately reflect her job
16 duties?

17 A. It did at the time, but she -- may I say --
18 add something and say she has been invaluable in leading
19 us through having an online Zoom convention. She's our
20 techie person to help us for that.

21 Q. A job duty that no one could have anticipated
22 she would need. I don't see a date on this --

23 I'm sorry, Mimi? I wasn't sure if it was an
24 objection.

25 MS. MARZIANI: No. I was just laughing about

1 the Zoom convention.

2 MR. HILTON: We're all experts on Zoom. I
3 didn't even know what Zoom was until two weeks ago. So
4 there you go.

5 Q. I'm not seeing a date on this job description.

6 Do you happen to know what date this was
7 created?

8 A. No. No, I'm sorry, I don't.

9 Q. That's okay.

10 A. There was nobody there before her. So we --

11 Q. When was she hired?

12 A. I -- I don't know that date specifically
13 either.

14 Q. Okay. To the extent that you know for any
15 reason, I'm sure Mimi can inform me later.

16 A. Okay. That would be great.

17 Q. Yeah, I don't think that's particularly
18 important, but if it becomes important, we'll deal with
19 it later.

20 A. Okay.

21 Q. Then the next couple of pages beginning Bates
22 325 continuing to Bates 326, that's another job --
23 that's an employment agreement for a full-time executive
24 administrator. Do I have that right?

25 A. Yes, sir, m-hm.

1 **Q. I'm also not seeing a date on this, but if you**
2 **could just remind me who the executive administrator is**
3 **and tell me what their duties are if there's any not**
4 **reflected on this document.**

5 A. Aileen McMurrer, and she is invaluable.
6 Imagine, there was just one person until we got Karen.
7 There was just one person doing all of this. She
8 coordinates between -- so she's the main go-to person at
9 the office that League members can call and ask
10 questions, voters can call and ask questions. She
11 refers people different places.

12 She's invaluable. She does newsletters. She
13 does development, which means creating whatever is
14 needed to try to bring in money. And this is basic, but
15 her, again, just like Karen, you know, both of them are
16 ready and willing at any time to step up and do whatever
17 is needed to get the work of the League done.

18 She goes with us to do the regional training.
19 She does trainings herself at regional trainings. She
20 does trainings and helps out with everything for
21 convention. Can you imagine an organization that I've
22 been talking about all day long, and we only had one
23 employee, and now we have one and a half. And it's just
24 great. We could use more.

25 **Q. They must be as dedicated and passionate as**

1 you to get it all done.

2 A. They are, and I really appreciate them.

3 Q. So I think we're on the last page of this pdf
4 anyway, Bates 327. I really don't know what I'm looking
5 at here. If you can explain it to me, I would
6 appreciate it.

7 A. So it came to my attention that it would be
8 important to know -- now I understand a little bit
9 more -- to know if a member of the League moved from one
10 place to another, and so we -- because that means they
11 would need to update their DPS driver's license; right?

12 So I contacted the LWVUS national office, and
13 they had a -- they have an IT person who does their
14 membership and coordinates all the membership, which is
15 very difficult, as you can imagine listening to me all
16 day long, local league, state league, national league.

17 And I had him look through the members and
18 find out -- and I'm sure there's more of them; these are
19 the ones he says were the most obvious -- that had moved
20 -- had changed their address on their membership data
21 that he has access to. So that's what this is.

22 Then it says the name of the League and
23 whether they're members who moved, inactive members who
24 moved. And sometimes it says "inactive," it's just at
25 one point in time, because they can update their

1 membership at any time.

2 Anyway, it's an example showing that League
3 members do move from place to place and have to update
4 their driver's license and their voter registration.

5 **Q. And you said this information came from some**
6 **sort of IT or technical-type person at the National**
7 **League of Women Voters?**

8 **A.** We don't have that access to that information.
9 We can input membership data, but we can't like analyze
10 or pluck out. We can -- we can find members. We can
11 see they are a member or were a member, but we can't
12 play with it. LWVUS, the first name is Jason, is able
13 -- was able to do this when I requested it from him.

14 The numbers on the left-hand side -- and it's
15 interesting because the numbers on the left-hand side
16 are each league and league-at-large, but these are just
17 leagues over there. They're not all of them. Each
18 local league is given a number.

19 So TX100, right, and then on the right-hand
20 side is the name of the League that they were a member
21 of. So the ones that are members of LWV of Texas are
22 the ones who are members probably as a league-at-large,
23 because I don't see any leagues-at-large in there.

24 **Q. That's exactly what I was going to ask.**

25 **This is a reflection of the number of local**

1 leagues, or sometimes you call them independent leagues,
2 as of 4/18/20, but the leagues-at-large are not
3 reflected separately on this document?

4 A. Each league-at-large is not reflected
5 separately.

6 Q. Got it.

7 A. The LWV of Texas, I'm not sure exactly what
8 that is. I suspect that it is the leagues-at-large, and
9 also there are members who don't belong to any local
10 league or unit. They are just people who live in
11 West Texas, and there is not enough people to form a
12 league.

13 Q. Got it. If I wanted to know -- I'm sorry.
14 If I wanted to know specifically who these
15 members were, I would have to talk to that person whose
16 name you mentioned at LWVUS?

17 A. Right. Absolutely.

18 Q. Neither you nor anyone at League of Women
19 Voters of Texas could tell me that, in other words?

20 A. That's correct. It would be LWVUS.

21 Q. And similarly, if I wanted to know whether any
22 of those people had plans to move again in the future,
23 nobody at the League of Women Voters of Texas could tell
24 me that?

25 A. No.

1 Q. Okay. I think that's all I have for this
2 document for now. If we can, I would like to switch
3 over to one of these other pdfs of documents that were
4 produced to us. This is the one that has "second
5 supplement" in the file name. It's Bates Nos. 330
6 through 344. That's also reflected in the file name.

7 A. Yes.

8 MR. HILTON: We'll make this the next exhibit
9 to the deposition. I think we're on Exhibit No. 8, but
10 I hesitate to even guess because I've done such a sloppy
11 job keeping track of that.

12 THE REPORTER: It's 8.

13 MS. MARZIANI: I believe that's correct.

14 MR. HILTON: Sorry about that. We'll try to
15 be better next time. I think it's Exhibit 8.

16 (Defense Exhibit No. 8 was marked for
17 identification.)

18 MR. HILTON: I'm used to being able to stamp
19 them in person and keep track of them that way.
20 Definitely next time on the Zoom depo, we've got to get
21 that straightened out. Sorry, Ms. Chimene, you're
22 dealing with my ineptitude today.

23 Q. Do you have that document in front of you?

24 A. Yes, sir.

25 Q. What is this document?

1 A. Okay. So this is a PowerPoint presentation
2 called "Ready to Vote" created by the League of Women
3 Voters Hays County. And it looks like it was created
4 for elections in 2019. That's what it says. "Hays
5 County Election 2019."

6 **Q. When was the first time you saw this document?**

7 A. Yesterday.

8 **Q. And again, it looks to be a 15-slide**
9 **PowerPoint presentation. Do you know whether that's the**
10 **case?**

11 A. I would have to count, but it looks like --

12 **Q. Well, they're numbered at the bottom. Let me**
13 **strike the question.**

14 **Is this -- do you know whether this is a**
15 **PowerPoint presentation?**

16 A. Yes. To me, it appears to be a PowerPoint
17 presentation.

18 **Q. Okay. But that's just based on you looking at**
19 **it now today?**

20 A. Looks like a PowerPoint presentation.

21 **Q. Got it. Looks like that to me, too. I'm just**
22 **trying to understand.**

23 **Do you know when or where this presentation**
24 **would be given?**

25 A. Let me look.

1 **Q. Yeah, feel free to look at the document if it**
2 **will help you answer the question.**

3 A. Just a second. Looks like a PowerPoint
4 presentation created to use for to educate the Hays
5 County area about the 2019 November 5th election.

6 Ah, so wonderful.

7 So I would suspect, because I did not create
8 it, they are a wonderful league that serves the Hays
9 County community. They're very active. They're
10 wonderful members of the League there. It is an
11 interesting community because they -- I'm friends with
12 many of them. I go to some of their meetings because
13 they're so close to Austin.

14 Tell me what the question was again. I'm so
15 sorry.

16 **Q. That's all right. I'm trying to get a sense**
17 **of when or where this presentation might have been**
18 **given. It's helpful to know a little more about the**
19 **Hays County League because they're the ones who made it.**

20 I understand your knowledge of this is
21 limited. I just wanted to get at anything else that you
22 can tell me about it really.

23 A. It's an example of how Leagues create voter
24 education for their community to educate their community
25 about upcoming elections. They did a fantastic job.

1 Their community includes rural/suburban areas and also
2 the -- wait, Texas State. So they have the Texas
3 students there, too.

4 So there's a lot of people coming in and out
5 of the Hays County region. A lot of people moving, and
6 so it is -- every league meets the needs of their
7 community, and this is a wonderful example of what a
8 great job this league does.

9 **Q. I'm sorry.**

10 A. Go ahead.

11 **Q. Is the Hays County League one of the**
12 **independent or local leagues?**

13 A. It is a local league.

14 **Q. So it's its own organization with its own**
15 **finances and its own bylaws and whatnot?**

16 A. It is, though, remembering that every member
17 of the League is a member of the Texas League and the
18 U.S. League. We all are one organization, but with
19 three tiers so that they can meet the needs of their
20 local community.

21 **Q. Yeah, you explained that. You explained that**
22 **previously. That's what you were referring to?**

23 A. Yeah.

24 **Q. All right. I think that's all I have on that.**
25 **I would like to turn now just to check my work**

1 and see if there's anything I missed. I would like to
2 turn to the 30(b)(6) notice. I'm certain that is
3 already exhibit but I won't even guess as to which
4 number. I can pull it up on my screen, but I think it's
5 No. 5.

6 MS. MARZIANI: It's No. 5.

7 MR. HILTON: 5, thanks, Mimi.

8 Q. I think you have a copy of that as well,
9 Ms. Chimene. I can pull it up on the screen if you
10 would like me to. But it is whatever is easier for you.

11 THE WITNESS: Mimi, what would it be called?

12 MS. MARZIANI: I sent it to you in the second
13 e-mail this morning with the complaint. And it's called
14 -- there's some numbers, and then it says notice, N-O-T,
15 notice of depo, League of Women Voters of Texas.

16 Grace, we can also -- Chris, can pull it up on
17 the screen also.

18 THE WITNESS: I think so because I've probably
19 got a hundred e-mails from people.

20 MR. HILTON: Q. If it's easier for me to pull
21 it up on the screen for you, I'm happy to do that.

22 MS. MARZIANI: Yeah, let's do that.

23 MR. HILTON: No problem. All right.

24 Q. Is that legible for you?

25 A. Yes.

1 Q. Okay, great. We talked about this a little
2 earlier. I'm going to scroll down to the list of
3 topics. I'm going to go one-by-one. I think we've
4 pretty much covered all this ground, or at least to the
5 extent I feel like we need to do today. I want to check
6 them with you to make sure there's nothing else we need
7 to talk about.

8 I think we've covered your mission pretty well
9 today. Is there anything else you would like to add
10 that's not something we talked about?

11 A. No. Our mission is, "Empower Voters,
12 Defending Democracy." Woo-hoo!

13 Q. And on No. 2, organization, organizational
14 structure, et cetera, et cetera, I think we've exhausted
15 your knowledge about that.

16 And Mimi, I think we discussed that as we went
17 along. To the extent we have other questions about this
18 that we need the answers to, I think that's something
19 you said we can work through offline?

20 MS. MARZIANI: Yes.

21 MR. HILTON: Q. Okay. No. 3 is budget and
22 funding amounts, we talked about that. There's a lot of
23 granular questions here about activities on which you
24 spent funds or which you dedicated resources in Texas
25 between January 1st, 2018, and the present, including

1 total spent on all activities, educating voters on
2 issues and candidates, et cetera, et cetera.

3 We went through those budget documents earlier
4 that contained some of this information. Is there any
5 other information in the document production that
6 relates to any of these topics?

7 A. I don't know what "document production" means.

8 **Q. I'm sorry, all the Bates numbered documents**
9 **that we've spent the better part of the day going**
10 **through today.**

11 A. Is there anything else? I don't recall. I
12 don't know. I would have to look. It's important to
13 notice resources since resources are important to know
14 about, Chris, because so much of our work is done by
15 individual members all across the state who belong to
16 the League. They're all volunteers.

17 **Q. And No. 5, activities on which you plan to**
18 **spend funds or which you plan to dedicate resources in**
19 **Texas, I didn't see much of that in the documents that**
20 **we went through today.**

21 **Are there projections, plans, future budgets**
22 **for future years through 2024 per your activities?**

23 A. So when we were going through the workbook for
24 this convention, the budget -- it was a budget. It's a
25 two-year projected budget; right? Isn't that what

1 you're looking for?

2 Q. If that's what -- if that's what the League
3 has on this topic, then yes, that's what I'm looking
4 for. I guess my question now is: Is there anything
5 else other than that budget projection that the League
6 has or that you can tell me about the League's plans to
7 spend fund or dedicate resources?

8 A. May I just say one -- something?

9 Q. Please.

10 A. The convention that we were going to have
11 included something called Fund a Need, and previously,
12 the Fund a Need funded the GOTV, things that Elizabeth
13 Erkel worked on. Then the next one, Fund a Need funded
14 the texting services and technology needs.

15 This Fund a Need was dedicated to
16 Get-Out-the-Vote for the 2020 elections. And we didn't
17 -- we didn't get to have it. So it is difficult. So
18 that is all about -- it was all about making the money
19 at convention to spend on these upcoming activities.

20 So we're going to try to recommence and get
21 that money back hopefully at a later date if we can have
22 some in-person meeting or through donations or through
23 grants or something. So we're -- we have a plan. We
24 just don't have the money at this time.

25 And so everything changed because of the

1 coronavirus. We will still have the dedicated
2 volunteers working on this. But the coronavirus is, you
3 know -- so the plan was to gather a lot of money, and I
4 suspect we would have gotten, you know, 30-, \$40,000 or
5 something at convention. And it's just a -- anyway, I
6 guess I'm a little tired.

7 So that was the plan, to use it for just
8 Get-Out-the-Vote, voter registration, and all the
9 different changes that we have to do with the voter
10 education with the members and the voters across Texas.
11 So...

12 Q. I understand. And I appreciate you sticking
13 with me today. And you know, I can only imagine how
14 frustrating and disappointing and sad it must be to have
15 geared up for all of this and have everything change.
16 So I certainly appreciate you talking about it. I know
17 it must be personally difficult for you.

18 So, that said, maybe I can ask my question
19 this way, and that will get me there. We talked about a
20 very large number of activities that the League engages
21 in in pursuit of its mission. We talked about your
22 mission in quite a bit of detail.

23 Are there any other activities that we haven't
24 touched on today that the League engages in?

25 A. We haven't touched on high school voter

1 registration efforts that we have on hold going across
2 Texas. We haven't touched on the changes to straight
3 party voting, which we need to educate voters on.

4 And we haven't touched on the fact that
5 without online voter registration, at this moment in
6 Texas, there isn't a way to register voters because most
7 of the people who register to vote don't have accesses
8 at this moment. I have a printer, but most people do
9 not have a printer, and the only access they have to
10 voter registration is to fill out one of those forms and
11 print it and sign it and mail it in.

12 Well, there are no stamps. The stores aren't
13 open. And so we have to create, instead of doing what
14 my normal plan is, I'm working with the Secretary of
15 State's office and the leagues and the members and
16 voters and other partnering organizations to create a
17 plan so that we can have a vibrant democracy here in
18 Texas right now.

19 And so that is taking up a huge amount of time
20 and effort because voters at this moment do not have
21 access to voter registration due to the coronavirus,
22 which I know is different than what we've been talking
23 about. But that is a huge effort that we're going to be
24 working on, too, and it is all about voter registration
25 and what the plans are here in Texas.

1 I'm sorry, I'm just very -- obviously or I
2 wouldn't be doing all this stuff.

3 Q. You would not put up with me for a whole day
4 if it weren't. And I appreciate you bringing up how the
5 coronavirus has kind of changed things, because you're
6 right, that's not something we touched on today, and
7 obviously not something we had in mind when we put most
8 of this together.

9 A. But those are the things, so you got a lot of
10 them. I see that, but that's just this huge other extra
11 stuff --

12 Q. Right.

13 A. -- lands on top of all of the members and each
14 of them is looking towards to -- towards somebody to
15 help them find a way to make sure that this -- the voter
16 registration in Texas that people can continue to be
17 registered to vote.

18 Anyway, so whatever.

19 Q. Any other activities or types of activities
20 that come to mind other than those? I appreciate those
21 additions, but I just want to make sure we touched on
22 every type of activity.

23 MS. MARZIANI: I just want to say objection,
24 form. Can you be a little more specific in that line of
25 questioning?

1 MR. HILTON: Q. I'm asking if there are any
2 other activities that the League engages in that we
3 haven't touched on today.

4 A. No, I think that -- I think this is pretty
5 comprehensive.

6 Q. I think it was, too, and I appreciate your
7 effort to do that. I appreciate that. I'm just asking
8 the final question to make sure we got it covered. And
9 we talked about -- we talked about expenditure of funds
10 in connection with the budget. I just want to make sure
11 I understand it correctly.

12 Well, you know what, I'm certain I do because
13 we already went through all of that. We're going to
14 skip those for now.

15 We're going to scroll down to Attachment B to
16 the Notice of Deposition, which was the document
17 requests. No. 1 is documents sufficient to substantiate
18 the factual allegations in certain paragraphs of your
19 complaint.

20 Did the League produce the documents necessary
21 to substantiate those allegations?

22 A. Yes.

23 Q. Are there any other -- I'm sorry?

24 A. I produced all the documents I think that, if
25 I understand the question correctly.

1 Q. Yeah. That's great. That's all -- I'm just
2 trying to confirm that we have all the documents we
3 asked for basically.

4 A. I think so.

5 Q. Okay. And are there any other documents
6 related or, you know, that would prove the factual
7 allegations in your complaint that you have not
8 produced?

9 A. I do not have any other documents that I can
10 recall at this moment.

11 Q. Okay. No. 2, it's, "All communications
12 between you," meaning the League, "and any person to
13 assist them in registering them to vote or updating
14 their voter registration information after a driver
15 license renewal or change-of-address transaction on the
16 DPS website."

17 Did I read that correctly or substantially
18 correctly?

19 A. Is this a whole sentence?

20 Q. It is one long, horrible sentence that I think
21 I am guilty for actually.

22 A. I'm trying to read it and understand it.

23 "All communication between you and any person
24 to assist them in registering to vote or updating their
25 voter registration information after a driver's license

1 renewal or change of address" -- so, oh. You're looking
2 for all communications between me and a person?

3 Q. Right, between the League and anyone helping,
4 you know, assisting them with their voter registration.
5 And we went through the Bates numbered documents
6 produced to us. I didn't see any e-mails or other
7 communications.

8 So I guess my question to you, Ms. Chimene,
9 were there any communications that should have been
10 produced and weren't? Or am I to understand that the
11 League doesn't have any documents reflecting such
12 communications?

13 A. I reviewed my e-mail, and it's a huge task,
14 and I don't recall a specific person asking me in
15 particular. I don't believe that leagues would have
16 this type of communications kept anywhere.

17 Does that answer the question?

18 Q. I think so.

19 A. I look for communications. I didn't find
20 communications, but all I had to look for was in my
21 e-mail.

22 Q. I think that answers my question, and I'm kind
23 of ending on a technical lawerly note, so I appreciate
24 you struggling here with me.

25 Paragraph 3 essentially says documents

1 sufficient to show information requested in some of the
2 deposition topic numbers that we just went through.

3 Did the League produce all documents
4 sufficient to show that information?

5 A. Yes.

6 Q. Are there any other documents that were not
7 produced that would also show this information?

8 A. Not that I know of at this moment.

9 Q. That's perfectly fine.

10 And then No. 4 is documents sufficient to show
11 organizational structure, hierarchy, things like that.

12 Did the League produce these documents that were
13 requested?

14 A. Yes.

15 Q. Are there any other documents that would
16 reflect information -- reflect this information that
17 were not produced?

18 A. Not that I can recall at this moment.

19 Q. And the last one just asks for all documents
20 that you reviewed in preparation for your deposition.

21 Were all those documents produced or some of
22 them were publicly filed in this case?

23 A. "To the extent not already provided in a
24 response to items 1 to 4, all documents reviewed in
25 preparation" -- the question --

1 Q. The question is -- the important point for my
2 question is the last bit. And that's do I have all the
3 documents that you reviewed in preparation for the
4 deposition?

5 A. Yes.

6 Q. Okay.

7 A. Thank you.

8 Q. As we were going through the deposition today,
9 since we're stuck doing this via Zoom, you were looking
10 on your computer and pulling up various files and
11 whatnot.

12 A. (Nods head.)

13 Q. Did you refer to any files or any documents
14 other than the ones that we've discussed and that were
15 produced to us?

16 A. No, I did not.

17 Q. Great. So what I would like to do is take a
18 short five-minute break and review my notes one more
19 time and make sure that there's nothing else that I
20 absolutely have to ask --

21 A. Okay.

22 Q. -- (overlapping) went easy by kind of giving
23 me everything that I needed and that we asked for in
24 this notice. And there were a couple areas where I
25 don't think you had answers to all my questions, which

1 your Counsel has told me we can work through offline.

2 To the extent that I need to, we'll reserve
3 any objection to the preparedness of the witness. But
4 it sounds like we're going to be able to work through
5 those issues separately.

6 With that reservation, let me take a couple of
7 minutes and review my notes, and we can go back on the
8 record, and hopefully be done with it.

9 A. Okay.

10 MS. MARZIANI: Wonderful. So we're going to
11 take five minutes?

12 MR. HILTON: Yeah, five minutes. We'll go off
13 the record, and then hopefully the last thing we'll have
14 to do is I'll pass the witness, and we'll be done.

15 THE WITNESS: All right. Thank you.

16 MR. HILTON: Thanks, ya'll.

17 THE REPORTER: Off the record.

18 (Recess taken: 4:01 p.m. to 4:09 p.m.)

19 MR. HILTON: Back on the record.

20 Thank you for bearing with me today.

21 Unfortunately, I went about an hour over what I intended
22 to do today, which is very uncharacteristic for me, but
23 hopefully I've been otherwise professional and courteous
24 to you today.

25 THE WITNESS: Yes, thank you.

1 MR. HILTON: Well, I've enjoyed our
2 conversation. I appreciate it, and we'll reserve any
3 remaining time in the remainder of our questions. And
4 I'll pass the witness.

5 MS. MARZIANI: Okay. Thank you. No direct
6 for me.

7 MR. HILTON: And the intervenors were on for
8 awhile and dropped off. I'm assuming they don't have
9 any questions. So I think that's it.

10 MS. MARZIANI: Yes, great.

11 MR. HILTON: Did ya'll want to read and sign
12 or confirm, whatever it is?

13 MS. MARZIANI: Yes, please. Can we reserve
14 the right to make the corrections?

15 MR. HILTON: Ms. Chimene, seriously, thank you
16 so much today. I really appreciate you. I know this
17 was a lot. It's hard to slog through this. I
18 appreciate you.

19 THE WITNESS: I expect to see you at the next
20 League Making Democracy Work event.

21 MR. HILTON: I hope that's an invitation. I
22 will take you up on that for sure.

23 THE REPORTER: Off the record?

24 MR. HILTON: Yes.

25 MS. MARZIANI: Yes, please.

1 (Discussion off the record.)

2 THE REPORTER: Mimi, did you need to order a
3 copy of the transcript?

4 MS. MARZIANI: Yes.

5 (Deposition adjourned at 4:11 p.m.)

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ERRATA AND SIGNATURE

WITNESS NAME:

DATE OF DEPOSITION:

GRACE CHIMENE

Tuesday, April 21, 2020

PAGE/LINE

CHANGE

REASON

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1 I, GRACE CHIMENE, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted herein.

4
5 _____
6 GRACE CHIMENE
7

8 THE STATE OF _____)

9 Before me, _____, on
10 this day personally appeared GRACE CHIMENE, known to me
11 (or proved to me under oath or through _____)
12 (description of identity card or other document) to be
13 the person whose name is subscribed to the foregoing
14 instrument and acknowledged to me that they executed
15 same for the purposes and consideration therein
16 expressed.

17 Given under my hand and seal of office on
18 this _____ day of _____, _____.

19
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21 _____
22 NOTARY PUBLIC IN AND FOR

23 THE STATE OF _____

24 My Commission Expires: _____
25

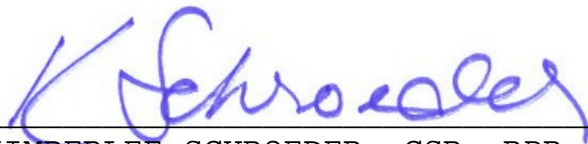
1 STATE OF TEXAS)

2 REPORTER'S CERTIFICATION

3 I, KIMBERLEE SCHROEDER, CSR, RPR, CCRR,
4 Certified Shorthand Reporter for the State of Texas,
5 License No. 10925 and the State of California, License
6 No. 11414, hereby certify that the witness was duly
7 sworn and that this transcript is a true record of the
8 testimony given by the witness.

9 I further certify that I am neither counsel
10 for, related to, nor employed by any of the parties or
11 attorneys in the action in which this proceeding was
12 taken. Further, I am not a relative or employee of any
13 attorney of record in this cause, nor am I financially
14 or otherwise interested in the outcome of the action.

15 Subscribed and sworn to by me this day,
16 6th day of May, 2020.

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20 
21 KIMBERLEE SCHROEDER, CSR, RPR, CCRR
22 TX CSR No. 10925 - CA CSR No. 11414
23
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Active Members Who Moved	Inactive Members Who Moved	Name
TX000	1	4 LWV Of Texas
TX100	2	10 LWV Of Austin Area
TX102	1	0 LWV Of San Antonio Area
TX103	1	0 LWV Of Corpus Christi
TX104	4	4 LWV Of Dallas
TX107	1	13 LWV Of the Houston Area
TX109	1	0 LWV Of Midland
TX111	1	0 LWV Of El Paso
TX113	0	1 LWV Of Tarrant County
TX114	4	1 LWV Of Bay Area
TX121	2	4 LWV Of Wichita Falls
TX123	0	1 LWV Of Amarillo
TX124	0	3 LWV Of Tyler/Smith County
TX127	0	0 LWV Of Lubbock
TX135	0	0 LWV Of Sherman/Grayson County
TX144	0	0 LWV Of Irving
TX146	1	0 LWV Of Denton
TX147	0	1 LWV Of Richardson
TX148	0	0 LWV Of Hays County
TX152	2	1 LWV Of Collin County
TX160	3	1 LWV Of Hill Country
TX162	1	1 LWV Of Comal Area
TX167	0	0 LWV of Lavaca County
Total	25	45
* Active as of 4/18/2020		Total Moved
		70

LWV-000327